

0166

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA

3 CASE NO. 08-CIV-80119- [REDACTED]

4 JANE DOE NO. 2,
5 Plaintiff,

6 -vs- VOLUME II OF II
7 JEFFREY EPSTEIN,
8 Defendant.

9
10 Related cases:

11 08-80232, 08-08380, 08-80381, 08-80994
12 08-80993, 08-80811, 08-80893, 09-80469
13 09-80591, 09-80656, 09-80802, 09-81092
14

15 VIDEO-CONFERENCED AND VIDEOTAPED DEPOSITION OF
16 [REDACTED]
17
18 December 4, 2009
19 10:25 - 5:00 p.m.
20 [REDACTED]
21
22

23 Reported By: [REDACTED]

24 Notary Public, State of Florida
25 Prose Court Reporting

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1 APPEARANCES:

2 On behalf of [REDACTED]:
3 JACK SCAROLA, ESQUIRE
4 SEARCY, DENNEY, SCAROLA,
5 BARNHART & SHIPLEY, P.A.
6 [REDACTED]
7

8 Phone: [REDACTED]
9

10 On behalf of the Defendant, Jeffrey Epstein:
11 ROBERT D. CRITTON, JR., ESQUIRE
MARK T. LUTTIER, ESQUIRE
BURMAN, CRITTON, LUTTIER & COLEMAN, LLP
[REDACTED]
[REDACTED]

12 Phone: [REDACTED]
13
14

15 ALSO PRESENT:

16 Jeffrey Epstein, via video conference

17 [REDACTED] Danchuk, Paralegal,
Richard H. Willits, P.A.

18
19 Stan Sanders, Videographer
Visual Evidence, Incorporated
20
21
22
23
24
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1 - - -
2 I N D E X V O L U M E I I
3 - - -
4

5 WITNESS: DIRECT CROSS REDIRECT RECROSS
6

7 [REDACTED]
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1 * * * * *

2 THE VIDEOGRAPHER: We're going back on the
3 record at 2:42.

4 BY MR. LUTTIER:

5 Q. Mom -- ma'am, at the break we had just

6 been discussing your relationship with a [REDACTED]
[REDACTED]. You used the phrase in your testimony
8 earlier, you used the phrase "eat out." Could you
9 describe what that phrase means in the context that
10 you were using it?

11 MR. SCAROLA: We will stipulate that what
12 it means is cunnilingus.

13 BY MR. LUTTIER:

14 Q. Okay. Do you know what a sex toy is?

15 MR. SCAROLA: Could you explain what
16 relevance or materiality your understanding of
17 that line --

18 MR. LUTTIER: Sure. It was --

19 MR. SCAROLA: -- of questioning might have
20 since there is no allegation that sex toys were
21 ever employed in encounters between [REDACTED] and
22 Mr. Epstein?

23 MR. LUTTIER: Well, I dispute that for
24 sure. I just tell you if you read the record
25 carefully, you will find out that is not at all

0170

1 true, and that's why it is relevant. Come up
2 many a time.

3 MR. SCAROLA: In connection with
4 allegations from [REDACTED]?

5 MR. LUTTIER: There and in the IME.

6 MR. SCAROLA: Okay. Well, if you
7 represent, if you represent that that's the
8 case, then proceed.

9 BY MR. LUTTIER:

10 Q. Do you know what a sex toy is?

11 A. Yes.

12 Q. Okay. And what is your understanding of
13 that term so that we are understanding each other
14 when I ask you these questions?

15 A. I guess toys used doing sexual things.

16 Q. Okay. And that would include, for
17 example, vibrators?

18 A. Yes.

19 Q. Dildos?

20 A. Yes.

21 Q. Have you used sex toys in the past?

22 A. No.

23 Q. Never?

24 A. Never.

25 Q. Either -- how about with [REDACTED]?

0171

1 A. No.

2 Q. Did you ever tell anybody you had?

3 A. No.

4 Q. Did you, did you ever use any sex toy with
5 Jeffrey Epstein?

6 A. He tried to use a massage thing and I told him
7 no.

8 Q. What did you mean by "massage thing"?
9 A. Whatever it was in the hell that he had.
10 Q. Well, what -- describe what you are
11 talking about.
12 A. I just told you.
13 Q. Well, massage thing doesn't tell me
14 anything. What are you talking about?
15 A. I don't know what it was called. I don't know
16 what it is.
17 Q. What did it look like?
18 A. It looked -- it was -- I don't know. It
19 vibrated. It looked like it was a neck massager.
20 Q. But do you know, do you know -- can you
21 describe, physically describe how big it was, what
22 color it was, what it looked like? Can you describe
23 anything about it?
24 A. It was gray and do you want me to draw you a
25 picture because I don't know how to describe what it

0172

1 looked like.
2 Q. How large was it?
3 A. It was like this big (indicating).
4 Q. Okay.
5 A. It was like a neck massager.
6 Q. You know like -- you know what Brookstone
7 is, a store?
8 A. Yeah.
9 Q. Have you ever been in there and they have
10 these massages that, like you can reach behind your
11 back and stuff like that. Are we talking about
12 something you know, like that?
13 A. Yeah, but it didn't have a wire, an electrical
14 wire.
15 Q. Okay.
16 A. It was like battery operated.
17 Q. And you say that Mr. Epstein tried to use
18 this on you and you said no?
19 A. Yeah.
20 Q. And then he --
21 A. That was the end of that.
22 Q. -- didn't use it?
23 A. He did not, and he's never, it never was
24 brought up again.
25 Q. Have you ever desired to use any kind of

0173

1 sex toy?
2 A. No.
3 Q. And, and then not done it for some reason?
4 A. No.
5 Q. Okay. Back to [REDACTED]. How many
6 sexual encounters would you estimate you had with
7 [REDACTED]?
8 A. I don't know.
9 Q. What's your best estimate with what degree

10 of frequency did you and she have a sexual
11 relationship?

12 MR. SCAROLA: Those are two different
13 questions, compound.

14 THE WITNESS: What does this --

15 MR. LUTTIER: With what --

16 THE WITNESS: What does this have to do
17 with me and Mr. Epstein?

18 BY MR. LUTTIER:

19 Q. With what degree of frequency did you and
20 [REDACTED] have sexual relations?

21 MR. SCAROLA: That's the second part of
22 the question that you asked.

23 MR. LUTTIER: That's the question. I will
24 break it up then.

25

0174

1 BY MR. LUTTIER:

2 Q. You've testified earlier that you and [REDACTED]
3 [REDACTED] had sexual relations?

4 MR. SCAROLA: We'll stipulate that that
5 occurred on multiple occasions.

6 BY MR. LUTTIER:

7 Q. All right. Tell me with what degree --

8 MR. SCAROLA: And beyond that an inquiry
9 is intended for no other purpose except to
10 annoy, harass, and embarrass.

11 MR. LUTTIER: With all due respect, I
12 disagree. So, I am going to ask my question.

13 MR. SCAROLA: And I disagree with your
14 disagreement. And I will instruct her not to
15 answer.

16 MR. LUTTIER: Okay. Let me get the
17 question out.

18 BY MR. LUTTIER:

19 Q. On how many occasions did you and [REDACTED]
20 have sexual relations?

21 MR. SCAROLA: And the stipulation is that
22 it occurred on multiple occasions and beyond
23 that no relevant inquiry can be made.

24 BY MR. LUTTIER:

25 Q. And when, when your lawyer stipulates that

0175

1 it's multiple occasions, if you had a relationship
2 with her for 12 months, can you estimate how many
3 times it was?

4 A. I refuse --

5 MR. SCAROLA: Don't answer that question.

6 THE WITNESS: -- to answer.

7 MR. LUTTIER: And you refuse to answer --

8 MR. SCAROLA: Because her lawyer has
9 instructed her not to answer because the
10 question is obviously intended, after the
11 stipulation, for no other purpose except to

12 annoy, embarrass, and harass the witness.
13 MR. LUTTIER: It's, it's not intended to
14 be annoying. I believe the degree of frequency
15 is absolutely relevant in the case.
16 MR. SCAROLA: To what -- to which element?
17 MR. LUTTIER: Arguable -- well --
18 MR. SCAROLA: To which element?
19 MR. LUTTIER: I don't want to --
20 MR. SCAROLA: To which element of the
21 offense?
22 MR. LUTTIER: I am not going to argue my
23 case to you, but it absolutely has an effect on
24 the alleged claim of damages. Beyond that I
25 don't need to tell you the theory of my case

0176

1 but --
2 MR. SCAROLA: I disagree.
3 MR. LUTTIER: Okay.
4 BY MR. LUTTIER:
5 Q. Do you, do you -- how did your
6 relationship with [REDACTED] end?
7 A. I met my son's father.
8 Q. Who is [REDACTED]?
9 A. Yeah.
10 Q. Did your relationship with [REDACTED]
11 end on an amicable basis?
12 A. What does that mean?
13 Q. Well, did you she and she both agree you
14 were going to go your separate ways --
15 A. Yeah.
16 Q. -- or did you just cut it off?
17 A. We agreed we would go separate ways.
18 Q. Did you have [REDACTED] name or any
19 portion of her name tattooed on your body?
20 A. Yes, I did.
21 Q. And what did you have tattooed on your
22 body?
23 A. [REDACTED].
24 Q. And when did you have that done?
25 A. While we were -- when I turned 18.

0177

1 Q. So, it would have been about six years,
2 five years after your relationship ended?
3 A. Yeah.
4 Q. And why did you have her name tattooed on
5 your body five years after you ended your
6 relationship with her?
7 A. Because I felt like it.
8 Q. Did you ever rekindle your relationship
9 with [REDACTED] --
10 A. No.
11 Q. -- after you, after your 13th birthday?
12 A. No.
13 Q. Did you maintain contact with [REDACTED]

14 after you and she broke off your relationship when
15 you met [REDACTED]?
16 A. No.
17 Q. With respect to the incident that you were
18 describing earlier when you were at Mr. Epstein's
19 house and you said there was another woman present
20 who was nude, do you recall that testimony?
21 A. Yeah.
22 Q. And was there any discussion between you
23 and she before she began to [REDACTED] on you?
24 A. And I told you no.
25 Q. No words at all exchanged?
0178
1 A. No.
2 Q. So you were just standing there and
3 this --
4 A. Yeah.
5 Q. And what, if anything, did you say when
6 this person began to [REDACTED] on you?
7 A. I didn't say anything. I just felt really
8 weird and I just stood there.
9 Q. And this is a person you had never seen
10 before?
11 A. Yes.
12 Q. And for how long a period did this person
13 [REDACTED] on you?
14 A. I don't know.
15 Q. And this is while you were standing?
16 A. Yeah.
17 Q. Did, did it, when you say you don't know,
18 are we talking about this went on for 15 or 20
19 minutes or this went on for three minutes?
20 A. Like 15, 20 minutes.
21 Q. Okay. Did you, did you move from where
22 you were standing to some other location while she
23 was doing this?
24 A. I just said no.
25 Q. Did you have an [REDACTED] --
0179
1 A. No.
2 Q. -- as a result of her performing? Did you
3 at any time during the 15 or 20 minutes that she was
4 [REDACTED] on you say anything to her?
5 A. Yeah, I told her to stop.
6 Q. And when did you tell her to stop?
7 A. After like 15 minutes, I told her to stop and
8 that I felt uncomfortable.
9 Q. And what did she do?
10 A. She stopped. And I told Jeffrey I wanted to
11 leave, and he gave me \$300 and I left.
12 Q. So, the first time you told this lady to
13 stop, she stopped?
14 A. Yeah.
15 Q. And you told Jeff you wanted to leave and

16 he didn't try to stop you?
17 A. No.
18 Q. Did you perform any sexual act on this
19 woman?
20 A. No.
21 Q. Did you touch her in any way?
22 A. No.
23 Q. And at the time that you were standing
24 there and this lady was [REDACTED] on you,
25 I assume she was kneeling or something?

0180

1 A. Yes.
2 Q. And where was Mr. Epstein during this?
3 A. Behind her having sex with her.
4 Q. While she was kneeling?
5 A. Yeah.
6 Q. Did you say anything to Mr. Epstein?
7 A. Besides that I wanted to leave, no.
8 Q. Which you said after 15 minutes, right?
9 A. Yeah.
10 Q. How about during the first 15 minutes, did
11 you say anything at all?
12 A. No.
13 Q. Did you say, you know, I am uncomfortable
14 with the set-up; I want to leave?
15 A. I just said no.
16 (Interruption at the door.)
17 MR. LUTTIER: At the time --
18 THE WITNESS: Can you not ask me questions
19 with somebody in the room?
20 BY MR. LUTTIER:
21 Q. What do you mean not ask you questions --
22 A. That man was in here.
23 Q. Had you had any sexual relationship
24 between any other woman other than [REDACTED] before this
25 incident that you have described that occurred at

0181

1 Mr. Epstein's?
2 A. No.
3 Q. Have you since the incident that occurred
4 at Mr. Epstein's that you've described, where this
5 lady [REDACTED] on you, had any sexual
6 contact with any other female?
7 A. No.
8 Q. Did you ever have any discussion with
9 anyone else at any time with respect to your sexual
10 relationship with [REDACTED]
11 A. What?
12 Q. Did you ever have any discussion with
13 anyone at any time about your sexual relationship
14 with [REDACTED]
15 A. My mother.
16 Q. And when did you discuss it with your
17 mother?

18 A. When I was with [REDACTED]. What does [REDACTED]
19 have to do with Mr. Epstein? This is why I am here,
20 because of Mr. Epstein.

21 Q. So, if I understand your testimony
22 correct, you would have discussions with your mother
23 about your relationship with [REDACTED] sometime while
24 you were 12 years of age; is that right?

25 A. Yes.

0182

1 Q. What was your mother's reaction?

2 A. She didn't have one.

3 Q. Did she say anything at all to you about
4 it?

5 A. No.

6 Q. Did you ever seek any type of counseling
7 with respect to your relationship with [REDACTED]?

8 A. For what?

9 Q. For anything. Did you ever discuss--

10 A. No.

11 Q. Did you ever tell any of your mental
12 health counselors about your relationship with
13 [REDACTED]?

14 A. No.

15 Q. Is there any reason why you didn't tell
16 your mental health counselors?

17 A. Because it --

18 Q. About your relationship with [REDACTED]?

19 A. Because it, it wasn't a problem. What is a
20 problem is you asking me about [REDACTED] when I am here
21 about what Mr. Epstein did to me. So, I refuse to
22 answer any more questions that you have about [REDACTED]
23 [REDACTED]. So, move on, please.

24 Q. What is the most traumatic event that
25 occurred in your life prior to late May or June of

0183

1 2002 when you met Mr. Epstein?

2 A. There wasn't one.

3 Q. So, if I recall your testimony this
4 morning, you were raped before you met Mr. Epstein?

5 A. I have no recollection of it so if --

6 Q. Wait. You were raped before you met
7 Mr. Epstein?

8 A. Yes, but I don't remember it happening, so I
9 mean --

10 Q. Were you molested by a relative --

11 A. Yes.

12 Q. -- before you met Mr. Epstein?

13 A. Yes.

14 Q. And that was your grandfather?

15 A. Yes.

16 Q. And over what period of time were you
17 molested by your grandfather?

18 A. I was a kid, a child, a baby child.

19 Q. Roughly over what period of time?

20 A. I don't know the period of time. I was under
21 the age of six.
22 Q. And it went on for an extended period of
23 time?
24 A. I don't know how long it went on for.
25 Q. Was that a disturbing event to you?
0184
1 A. A disturbing, yes.
2 Q. Did you talk to your mental health
3 counselors and advisers about it?
4 A. I told [REDACTED] when I was 13.
5 Q. Were you molested by another relative of
6 yours --
7 A. Yes.
8 Q. -- at any time? And who else were you
9 molested by?
10 A. My cousin.
11 Q. And approximately how old were you when
12 that occurred?
13 A. I don't know.
14 Q. Did you bring any, or was any action
15 brought on your behalf, lawsuit, against your
16 grandfather --
17 A. No.
18 Q. -- as a result of him molesting you?
19 A. No.
20 Q. Did you sue the individual that raped you?
21 A. I don't know who raped me.
22 Q. Well, did you tell [REDACTED] in your
23 meeting with him that you called the police after
24 the rape and had the individual arrested?
25 A. No, I did not. So if he wrote that, then he
0185
1 lied.
2 Q. Okay. Well, fortunately it is videotaped.
3 MR. SCAROLA: Fortunately it is, because
4 you have not accurately reflected what is in
5 [REDACTED] notes.
6 BY MR. LUTTIER:
7 Q. Okay. Did, did you bring a lawsuit
8 against anyone as a result of your rape?
9 A. No. How can you sue somebody for raping you
10 if you don't know who did it?
11 Q. Well, presumably at some point you went to
12 the beach with this male, correct?
13 A. Yeah.
14 Q. You got there under your own power; that
15 is you walked out there?
16 A. Yes, but I don't remember the person's name.
17 Q. And when you walked down there with this
18 person, you knew who that person was at that time?
19 A. Yes.
20 Q. And you went there with a girlfriend of
21 yours as well, did you not?

22 A. Yes.
23 Q. And she had somebody with her?
24 A. Yes. They were her friend.
25 Q. So, you had a girlfriend who knew the name
0186
1 of this person --
2 A. Yes.
3 Q. -- that went with you?
4 A. But I don't know where that friend is now.
5 Q. And the day or the time that you woke up
6 after this rape, the girlfriend that you went to the
7 beach with was there?
8 A. Yes.
9 Q. And presumably you could have asked her
10 what the name of this boy was?
11 A. Well, I was scared.
12 Q. Did you ask her what the name of the boy
13 was?
14 A. No, I didn't. I was scared. I was confused.
15 Q. Did she call the police?
16 A. I don't know what she did.
17 Q. But in your presence at no time --
18 A. She did not.
19 Q. You represented earlier, I believe, that
20 you were in some type of car accident?
21 A. Yes.
22 Q. How many car accidents have you been in?
23 A. One.
24 Q. And in what year was that?
25 A. '08.
0187
1 Q. And did, did you bring a claim against
2 anyone as a result of any injury you suffered in
3 that accident?
4 A. I think my, I think my mom, we did, yeah.
5 Q. Well, if you did it in '08, it would have
6 been when you were an adult. You were already 18
7 years of age?
8 A. Yeah, I had just had my daughter.
9 Q. Okay. Then if, if you were an adult, you
10 would have been the one to bring the claim?
11 A. Well, my mom did it. We were at a dead stop
12 and somebody hit us and then we were hit again.
13 Q. Okay. Did you, did, did you and your mom
14 assert a claim against an insurance company or the
15 person that hit you?
16 A. Yeah.
17 Q. Did that result in getting some kind of
18 settlement?
19 A. I don't know.
20 Q. Did --
21 A. I think my case is still pending with it.
22 Q. Did you, did you have a lawyer
23 representing you in that action?

24 A. Yes.
25 Q. Who was the lawyer?
0188
1 A. John Carroll I think.
2 Q. And your recollection is you think there
3 is currently a lawsuit pending?
4 A. Yeah. I am not sure.
5 Q. In your answers to interrogatories you
6 were asked if you had ever been a party to a lawsuit
7 and you responded no. Has the lawsuit --
8 A. Because my mom is the one that is doing it. I
9 was a passenger in her car, so I don't understand. I
10 don't know.
11 Q. Other than this lawsuit arising out of the
12 automobile accident, is there any other lawsuit in
13 which --
14 A. No.
15 Q. -- you have ever been a party?
16 A. No.
17 Q. Was your deposition taken in the lawsuit
18 arising out of the car accident?
19 A. Something like this?
20 Q. Yes.
21 A. No.
22 Q. And is the lawsuit pending in Palm Beach
23 County?
24 A. I guess.
25 Q. In this case you've got a couple of
0189
1 lawyers. One is Mr. Willits?
2 A. Right.
3 Q. Let me see if I have got right here.
4 Yeah, Willits. And how did you get to Mr. Willits?
5 Did you know him before this action?
6 A. No.
7 Q. How was it that you got to Mr. Willits?
8 A. I looked him up.
9 Q. Where did you look him up?
10 A. In the phone book.
11 Q. Yellow Pages?
12 A. Yes, I did.
13 Q. And you were looking up what? What
14 subject matter were you looking up?
15 A. Civil attorneys.
16 Q. Had you ever met Mr. Willits before you
17 employed him to undertake your representation in
18 this matter?
19 A. Wouldn't that still fall under if I have known
20 him before this?
21 Q. I don't know. So, the first time you ever
22 laid eyes on him or communicated with him is with
23 respect to this suit?
24 A. Obviously, yes.
25 Q. Do you know an individual by the name of

0190

1 Brad Edwards?

2 A. No.

3 Q. Have you ever heard his name before?

4 A. No.

5 Q. Do you know other women that have brought
6 claims against Mr. Epstein?

7 A. Yes.

8 Q. What other women do you know that have
9 brought claims against Mr. Epstein?

10 A. That's not my information to give you.

11 Q. My question stands.

12 A. I don't feel comfortable telling him.

13 MR. SCAROLA: Well, if you know the names
14 of other women who you know have brought
15 claims.

16 THE WITNESS: I know [REDACTED] has. I don't
17 know her last name. And I found out after I
18 filed my suit.

19 BY MR. LUTTIER:

20 Q. Anyone else?

21 A. Not that I know of, that are my friends.

22 Q. Well, my question --

23 A. Me and [REDACTED] haven't talked since this accident
24 just for the record.

25 Q. My question wasn't limited to your

0191

1 friends. My question was did you know other women,
2 do you know other women that have brought claims to,
3 against Mr. Epstein?

4 A. Personally, no.

5 Q. Well, how would you know them if you
6 didn't know them personally?

7 A. I said no.

8 Q. Well, I'm, I'm getting the impression that
9 you're, you're being --

10 A. [REDACTED] is the only person that I know that has.

11 Q. And what did you mean when you answered
12 earlier to my question when I asked you if you knew
13 other women that had brought claims against
14 Mr. Epstein, you answered yes?

15 A. And you wrote down [REDACTED], did you not?

16 Q. That's the only person that you were
17 referring to?

18 A. Yes.

19 Q. Have you ever heard of a lady by name of
20 [REDACTED]?

21 A. No.

22 Q. Jane Doe?

23 A. No.

24 Q. Who -- all right. This person, [REDACTED], how
25 do you know this person, [REDACTED]?

0192

1 A. She was a friend of mine.

2 Q. And she was a friend of yours commencing
3 when? When did you first meet her?
4 A. I don't remember. Years ago.
5 Q. Before you went to see Mr. Epstein?
6 A. No. She, I met her through my friend [REDACTED].
7 Q. Who -- what's [REDACTED]'s name?
8 A. [REDACTED].
9 Q. Do you know any other girls that claim to
10 have gone to Mr. Epstein's house to perform massages
11 on him?
12 A. Do what?
13 Q. Do you know any other girls that have gone
14 to Mr. Epstein's house and claimed to have performed
15 massages on him?
16 A. Me, [REDACTED], and [REDACTED], those are the only girls
17 that I know.
18 Q. And how is it that you met [REDACTED] through
19 [REDACTED]?
20 A. How do you meet your friends through friends?
21 Q. I have no idea. I mean, were you guys at
22 a party together, did you get on the phone with each
23 other? What did you do?
24 A. We were hanging out.
25 Q. "Hanging out," what's that mean?
0193
1 A. When you hang out.
2 Q. Were you at a function and all three of
3 you were there, for example?
4 A. Obviously we were at something hanging out.
5 Q. And did there come a time that you took
6 anyone to Mr. Epstein's house?
7 A. Yes.
8 Q. When was that?
9 A. I don't remember the times and dates but I
10 took [REDACTED] and [REDACTED].
11 Q. And which did you take first?
12 A. [REDACTED].
13 Q. And in respect to when you went to
14 Mr. Epstein's between May and June of '02 and August
15 of '03, when was it that you took [REDACTED]?
16 A. Bro, I don't know. I just told you I don't
17 know times and dates.
18 Q. I realize you don't know the exact time.
19 But was it in '02 or was it in '03?
20 A. If I, if you know that I don't know the dates,
21 how would you ask me if it was in '02 or '03?
22 Q. Well, what's your best estimate of how
23 many visits you had made to Mr. Epstein's before you
24 took [REDACTED]?
25 A. I have no idea.
0194
1 Q. More than ten?
2 A. Probably.
3 Q. How long had you known [REDACTED] before you

4 took her to Mr. Epstein's?
5 A. I have known [REDACTED] for years. I met [REDACTED], I
6 don't know. Ask me the question again, please.
7 Q. How long had you known [REDACTED] before you
8 took her to Mr. Epstein's?

9 A. For about a year.

10 Q. And how did you meet [REDACTED]?

11 A. She lived down the street from me.

12 Q. Was she a close friend?

13 A. Yes, she was. She was my best.

14 Q. You wouldn't do anything to harm her,
15 correct?

16 A. Correct.

17 Q. By the time you took [REDACTED] to
18 Mr. Epstein's, you had performed massages for
19 Mr. Epstein in the total nude; is that correct?

20 A. Uh-huh.

21 THE COURT REPORTER: Is that a yes?

22 THE WITNESS: Yes.

23 BY MR. LUTTIER:

24 Q. You had already had this sexual
25 relationship with this woman that you described

0195

1 earlier at Mr. Epstein's?

2 A. Yes.

3 Q. You mentioned earlier that on these
4 occasions when you gave Mr. Epstein a massage, he
5 would masturbate I believe you said; is that right?

6 A. Yes.

7 Q. Did that occur, that is Mr. Epstein
8 masturbating, on each and every occasion when you
9 went to Mr. Epstein's from the first occasion to the
10 last occasion?

11 A. Yes.

12 Q. Did you physically see him masturbating?

13 A. Yes.

14 Q. That is there was no towel covering his
15 genitalia or anything like that?

16 A. No.

17 Q. Before you went to Mr. Epstein's for the
18 first time, you had had sexual relations with other
19 males, had you not?

20 A. Yes.

21 Q. And you'd had sexual relations with how
22 many males before you went to Mr. Epstein's for the
23 first time?

24 A. Three.

25 Q. And what did those sexual relationships

0196

1 consist of that you had had before you went
2 Mr. Epstein's?

3 A. Intercourse.

4 Q. Did -- had you, other than with [REDACTED],
5 had you had any oral sex with any individual

6 other --
7 A. No.
8 Q. -- than [REDACTED] before you went to
9 Mr. Epstein's for the first time?
10 A. No.
11 Q. Before you went to Mr. Epstein's for the
12 first time, had you seen any, either these males
13 that you had previous relationships with or any
14 other male masturbate?
15 A. No.
16 Q. Had you seen any pornographic materials
17 before you went to Mr. Epstein's for the first time?
18 A. No. I don't watch porn.
19 Q. Had, have you ever been photographed in
20 the nude?
21 A. No. At Mr. Epstein's, yes.
22 Q. How about any place other than
23 Mr. Epstein's?
24 A. No.
25 Q. And who photographed you in the nude at
0197 Epstein's?
2 A. [REDACTED].
3 Q. [REDACTED] who?
4 A. [REDACTED].
5 Q. And when in this time period that you went
6 to Mr. Epstein's did [REDACTED] photograph you in the
7 nude?
8 A. It had to have been in the summer. It was in
9 the summer.
10 Q. And why do you know it was in the summer?
11 A. Because it was summertime.
12 Q. And where did this photographing occur?
13 A. In Mr. Epstein's house.
14 Q. Where in the house?
15 A. Everywhere in the house, outside by the pool,
16 and outside off the dock by the Intracoastal.
17 Q. Were you photographed on more than one
18 occasion?
19 A. No.
20 Q. Let me rephrase the question. You
21 mentioned that you were photographed everywhere in
22 the house?
23 A. Yes.
24 Q. Was there --
25 A. It was in the same day.
0198
1 Q. But more than one picture was taken?
2 A. Yes.
3 Q. All right. And what type of, do you know
4 what type of camera was used? Was it a digital
5 camera or a --
6 A. A digital camera.
7 Q. All right.

8 A. It was digital -- it wasn't like a digital
9 camera like, it was like a photography digital camera
10 like a professional camera, a professional digital
11 photography camera.
12 Q. Are you, are you --
13 A. Not like one you buy at Wal-Mart.
14 Q. When you're describing it as a
15 professional digital camera, are you talking about a
16 camera that's got a big lens on it?
17 A. Yes.
18 Q. And did this --
19 A. And there, and there was a regular digital
20 camera. She used two different cameras.
21 Q. And you say this was, in addition to being
22 in the house, was that on a dock?
23 A. Yes.
24 Q. And, and were you completely nude for all
25 of these photographs?
0199
1 A. Yes.
2 Q. So this happened in the daytime?
3 A. Yes.
4 Q. I assume the dock is out somewhere near
5 the Intracoastal?
6 A. Yes.
7 Q. Out in plain view?
8 A. But there was nobody outside. I made sure
9 there was nobody that could see me.
10 Q. Had anyone before that occasion ever
11 photographed you in the complete nude?
12 A. And I already said no.
13 Q. And how many photographs would you
14 estimate were taken?
15 A. I don't know. At least ten.
16 Q. Did you -- how, how is it that it -- well,
17 strike that.
18 Did, did [REDACTED] ask you if she could take
19 photographs of you in the nude?
20 A. She called me and told me that Mr. Epstein
21 would pay me \$500 if there could be nude pictures taken
22 of me. And my words to her were only if you take them;
23 I will not let Mr. Epstein take them of me.
24 Q. All right. So you set the conditions
25 under which the photographs were to be taken?
0200
1 A. Yes.
2 Q. And the photographs were taken with your
3 knowledge and consent, correct?
4 A. (Witness nods head.)
5 Q. Did you ever see the photographs?
6 A. Since that day, no. I saw them on the camera.
7 I've never seen the actual photographs.
8 Q. Did you make any comment to [REDACTED] about
9 the photographs?

10 A. Yeah, I asked them what would happen with
11 them, and she told me that they were for Mr. Epstein's
12 personal enjoyment.

13 Q. Was Mr. Epstein present when these
14 photographs were taken?

15 A. No, not to my awareness.

16 Q. You -- that is on the occasion that you
17 went to the house when these photographs were taken,
18 you never saw Mr. Epstein?

19 A. Yes, I didn't see Mr. Epstein. No.

20 Q. Have you ever been photographed in any
21 kind of sexual act?

22 A. No.

23 Q. Have you ever been filmed in the nude --

24 A. Yes.

25 Q. -- as supposed to still pictures. When

0201

1 were you filmed in the nude?

2 A. With one of my boyfriends.

3 Q. And which one was that?

4 A. [REDACTED].

5 Q. And when was he your boyfriend?

6 A. I was 13.

7 Q. Excuse me?

8 A. When I was 13.

9 Q. And how did you know [REDACTED]?

10 A. He was my boyfriend.

11 Q. Did you, what did you grow up in the
12 community with you?

13 A. We went to school together.

14 Q. Was this before or after the point in time
15 that you had your relationship with [REDACTED]?

16 A. It was after. Well, it was before. I
17 don't -- it was like during type of thing. Even though
18 she was my girlfriend, we still had boyfriends if that
19 helps you.

20 Q. Who -- was anyone filmed with you in the
21 nude?

22 A. No, just me and him.

23 Q. But the film was of the two of you
24 together as supposed to just you alone?

25 A. Yes.

0202

1 Q. And what were you and he doing in the
2 film?

3 A. Having sex.

4 Q. Just intercourse?

5 A. Yeah.

6 Q. And who was doing the filming?

7 A. The camera.

8 Q. So, it was placed on a tripod or
9 something?

10 A. Yeah.

11 Q. And where did the filming take place?

12 A. In the privacy of our bedroom.
13 Q. At your house?
14 A. Yes.
15 Q. And when I say your house, I mean the
16 house that you were living in at the time.
17 A. No, it was his house.
18 Q. And did, obviously you were aware of the
19 fact you were being filmed?
20 A. Yes.
21 Q. Did, did [REDACTED] (phonetic) ask you --
22 A. His name is [REDACTED].
23 Q. Did [REDACTED] ask you if he could do that
24 beforehand?
25 A. Yes.
0203
1 Q. Did you indicate to him that you had any
2 reservations about it?
3 A. Did I indicate --
4 Q. Did you tell him it was okay to do it?
5 A. Yes.
6 Q. Did you guys watch the film after you did
7 it?
8 A. Yes.
9 Q. Was the film --
10 A. And we laughed about it.
11 Q. Was the film ever shown to anyone else?
12 A. No. The tape was destroyed.
13 Q. For what period of time did you have a
14 sexual relationship with [REDACTED]?
15 A. I don't know. For as long as we dated.
16 Q. Are we talking about a year?
17 A. No. Less than that. Couple of months.
18 Q. Less than a year. How, roughly on how
19 many occasions would you estimate you had sex with
20 [REDACTED]?
21 A. I don't know.
22 Q. Did you have it with any degree of
23 regularity? I mean, once a week, twice a week?
24 A. Once or twice a week.
25 Q. Did -- when you had sex with [REDACTED]
0204
1 when you were 13 once or twice a week, did you take
2 any precautions about getting pregnant?
3 A. Yeah.
4 Q. And what precautions did you use?
5 A. A condom.
6 Q. Have you ever had any abortions?
7 A. No.
8 Q. You have two children?
9 A. Yes, I do.
10 Q. And when was your first child born?
11 A. When I was 17.
12 Q. Do you know your child's birthday?
13 A. Yeah, [REDACTED].

14 Q. And that's the child with [REDACTED]?

15 A. Yes.

16 Q. And then you had a daughter with

17 [REDACTED]?

18 A. Yes.

19 Q. And what's your daughter's birthdate?

20 A. [REDACTED].

21 Q. And where was your child with [REDACTED]

22 born?

23 A. Good Samaritan Hospital.

24 Q. Where was the child with [REDACTED] --

25 A. Good Samaritan hospital.

0205

1 I planned both my children.

2 Q. Did you, have you at any time lost a

3 pregnancy; that is been pregnant --

4 A. Yes, I have.

5 Q. Okay. And when did that occur?

6 A. April of '08.

7 Q. Literally a month, less than a month after

8 you had --

9 A. Before.

10 Q. Your child -- okay. Let's go back because

11 you, if I got your testimony right --

12 A. Oh, not '08. I'm sorry.

13 Q. Yeah.

14 A. My daughter was born in [REDACTED] It was '07.

15 Q. Okay. April of '07 is when you lost a

16 child?

17 A. Uh-huh.

18 Q. And who was the father of that child?

19 A. That's irrelevant.

20 Q. Was it someone other than [REDACTED]?

21 A. Yes.

22 Q. Was it [REDACTED]?

23 A. No, it was not.

24 Q. Was it [REDACTED]?

25 A. Yes.

0206

1 Q. Had, had that been a planned pregnancy?

2 A. No.

3 Q. Was that, that is the loss of the child

4 that you had with [REDACTED], a traumatic event to

5 you?

6 A. No.

7 Q. And by traumatic I mean were you upset

8 about it?

9 A. No.

10 Q. And do you know why you weren't upset

11 about it?

12 A. Because it obviously wasn't meant to happen

13 because I didn't do anything for my child to die. It

14 just died inside me, so obviously it wasn't meant to be.

15 Q. And where were you at the time that that

16 occurred?
17 A. That, that I was hospitalized for?
18 Q. No, when you first lost the child.
19 A. I was in New Jersey.
20 Q. Were you living in New Jersey at sometime?
21 A. Yes, I was.
22 Q. When did you live in New Jersey?
23 A. Earlier that year in 2007.
24 Q. And obviously then there had come a time
25 sometime in early 2007 when you changed your
0207 residency from Florida and moved to New Jersey?
2 A. Yes. And then I moved back to Florida and
3 started having a miscarriage. And I had to have an
4 operation. And the baby was dead inside me, and I was
5 five months pregnant.
6 Q. When you moved to New Jersey, did you move
7 with this [REDACTED]?
8 A. Yes.
9 Q. And when did you first meet [REDACTED]?
10 A. In '06.
11 Q. When?
12 A. '06.
13 Q. Had -- how would you characterize your
14 relationship with [REDACTED]?
15 A. Great.
16 Q. Any domestic violence?
17 A. Nope.
18 Q. Had he ever threatened you?
19 A. Nope.
20 Q. When did you first meet [REDACTED]?
21 A. When I was 13.
22 Q. Did you, did you meet him before you first
23 went to Mr. Epstein's?
24 A. Yes.
25 Q. Had you had a sexual relationship with
0208 [REDACTED], obviously?
2 A. Yes.
3 Q. Had you had sex with [REDACTED] before you
4 went to Mr. Epstein's the first time?
5 A. Yes.
6 Q. And what sexual acts had you engaged in
7 with [REDACTED] before you went to Mr. Epstein's?
8 A. Intercourse.
9 Q. And did you consider [REDACTED] to be your
10 boyfriend?
11 A. Yeah.
12 Q. And were you dating him during the entire
13 period of time that you went to Mr. Epstein's?
14 A. Yeah.
15 Q. And did [REDACTED] ever physically bring
16 you to Mr. Epstein's house?
17 A. Yes.

18 Q. Did you ever pay [REDACTED] any money for
19 bringing you to Mr. Epstein's house?
20 A. No.
21 Q. Did [REDACTED] ever bring anyone else to
22 Mr. Epstein's house?
23 A. My brother came with us but he didn't bring
24 any other females, no.
25 Q. How about [REDACTED]?
0209
1 A. Oh, [REDACTED] and [REDACTED], when I went with them. He
2 didn't bring them there by themselves.
3 Q. Let me go back and make sure my question
4 is clear. Was there, was there ever an occasion
5 that [REDACTED] drove a vehicle in which there were
6 other girls that were delivered to Mr. Epstein's
7 house other than just yourself?
8 A. You say delivered like we're a bunch of
9 flowers for him.
10 Q. Pick whatever, what word would you prefer,
11 dropped off?
12 A. Yes, that sounds a lot more better than
13 delivered.
14 Q. Fine. Whatever you want. Ever any
15 occasion where [REDACTED] brought any females that
16 he dropped off at Mr. Epstein's other than --
17 A. Yes, me and [REDACTED], and me and [REDACTED].
18 Q. Did [REDACTED] or [REDACTED] ever pay [REDACTED] any
19 money for bringing them?
20 A. No.
21 Q. Did you ever receive any money from
22 Mr. Epstein for bringing [REDACTED]?
23 A. Yes.
24 Q. How much did you get?
25 A. An extra \$100.
0210
1 Q. And did you tell [REDACTED] that you were paid
2 \$100 by Mr. Epstein to bring her to him?
3 A. Yes.
4 Q. And what was her response?
5 A. I want half.
6 Q. And what did you say to that?
7 A. Okay.
8 Q. So, you gave her 50 of the \$100?
9 A. Yeah.
10 Q. And everybody was happy?
11 A. Yeah.
12 Q. Did you bring [REDACTED] on more than one
13 occasion?
14 A. Yes.
15 Q. Did you get paid \$100 on each occasion --
16 A. Yes.
17 Q. -- that you brought [REDACTED]? Did you tell
18 [REDACTED] on each occasion when you got paid \$100 to
19 bring her?

20 A. Yes.
21 Q. And did you give her half the 100 or \$50
22 every time --
23 A. Yes.
24 Q. -- that you were paid? On how many
25 occasions did bring [REDACTED] and get paid \$100?
0211
1 A. Three or four times.
2 Q. How much did [REDACTED] get paid to come to
3 Mr. Epstein's?
4 A. 200, sometimes three. I'm not sure which
5 times. Probably the times when she went there herself.
6 Q. Did [REDACTED] go to Mr. Epstein's on occasions
7 other than when she went with you?
8 A. Yes.
9 Q. But she had never been there until you
10 took her the first time?
11 A. Yes.
12 Q. Were you the individual that first
13 suggested to [REDACTED] that she go to Mr. Epstein's?
14 A. Obviously if I'm the one who brought her there
15 for the first time.
16 Q. Well, it would be possible that she could
17 have heard of Mr. Epstein from someplace else.
18 A. No.
19 Q. So the first time she heard the name
20 Jeffrey Epstein was from you?
21 A. Yes.
22 Q. And on the first occasion when you told
23 [REDACTED] about Jeffrey Epstein, what did you tell her?
24 A. That we would go there and give him a massage
25 and he might ask you to get topless.
0212
1 Q. Did you tell her at the time that you
2 first discussed it with her everything that you had
3 experienced in going to Mr. Epstein's?
4 A. No.
5 Q. Why not?
6 A. Because I knew she wouldn't be exposed to it.
7 Q. And this was your best friend?
8 A. Yes.
9 Q. And you say you knew what?
10 A. I knew that she wouldn't be exposed to it.
11 Q. What do you mean she wouldn't be exposed
12 to it?
13 A. Because I knew that I felt uncomfortable with
14 the thing with the girl. And I told Jeffrey if he did
15 it to my friends, I would not bring them.
16 Q. Okay.
17 A. So I knew that she wouldn't have been exposed
18 to it.
19 Q. So, in your, you had some conversation at
20 some point in time with Jeffrey Epstein about --
21 A. I took -- when he asked me to bring some girls

22 my age, I told him that I would not bring my friend if,
23 if that situation was to occur with her because I didn't
24 like it. I felt uncomfortable, and I would not subject
25 my friend to it.

0213

1 Q. Is that the only thing that had occurred
2 when you were at Mr. Epstein's that you did not tell
3 [REDACTED] about?

4 A. Yes.

5 Q. So, you had told [REDACTED] that Mr. Epstein
6 might masturbate while she was there?

7 A. Yes.

8 Q. Did you tell her that he might ejaculate
9 while she was there?

10 A. Not on her but yes.

11 Q. Well, did Mr. Epstein ever ejaculate on
12 you?

13 A. No.

14 Q. All right. What did you tell [REDACTED] before
15 you took her there for the first time about what the
16 state of dress that she would be in?

17 A. I just told her to wear clothes.

18 Q. Did you tell her that she may be asked to
19 be totally nude?

20 A. I said that she, she might ask to take off
21 some of her clothes. I didn't specifically say you're
22 going to have to get naked.

23 Q. But you had been, at that point in time
24 that you first took [REDACTED] there, you had been totally
25 nude for months while performing massages for

0214

1 Mr. Epstein, correct?

2 A. So.

3 Q. Correct?

4 A. Yes.

5 Q. But you didn't tell your best friend that?

6 A. No, because if he was going ask her, that
7 would be him asking her and that would be her own
8 decision.

9 Q. You didn't consider there to be anything
10 dangerous about going to Mr. Epstein, did you?

11 A. No.

12 Q. I mean, you never felt like you were in
13 danger when you went to Mr. Epstein's did you?

14 A. No.

15 Q. You never felt that any harm was going to
16 come to you?

17 A. No.

18 Q. And you really never had any fear about
19 going there, correct?

20 A. Correct. May I take a break to go to the
21 bathroom?

22 MR. LUTTIER: Sure.

23 THE VIDEOGRAPHER: Off the record at 3:30.

24 (A brief recess was held.)
25 THE VIDEOGRAPHER: We're back on the

0215

1 record at 3:43.

2 BY MR. LUTTIER:

3 Q. You mentioned earlier that you had seen a

4 [REDACTED]. Is that [REDACTED]?

5 A. Yes, [REDACTED].

6 Q. Have you consulted with any other, what we
7 call expert witness in this case, that is someone
8 that's been hired to assist you in your case, not
9 your lawyers but --

10 A. No.

11 Q. Okay. Do you, have you spoken with anyone
12 else about the possibility of testifying in this
13 case?

14 A. Like who?

15 Q. Anybody.

16 A. No. Probably my son's father because he took
17 me there.

18 Q. That would be --

19 A. My mother.

20 Q. -- [REDACTED]?

21 A. Yes. And my mother.

22 Q. And, and when did your relationship with
23 [REDACTED] end, if it ended?

24 A. When I was 18.

25 Q. That's '05?

0216

1 A. Yeah.

2 Q. So you were with him from what did you
3 tell me, 0 --

4 A. '01.

5 Q. '01 to '05, correct?

6 A. Yes.

7 Q. Did there -- there obviously came a time
8 that you got pregnant with [REDACTED]?

9 A. Obviously.

10 Q. Did you and [REDACTED] leave the State of
11 Florida together at some point in time?

12 A. Yes.

13 Q. And approximately when was that?

14 A. It was in July when I was 16.

15 Q. '03?

16 A. Yeah.

17 Q. Is that the same time that you stopped
18 going to Mr. Epstein's?

19 A. Uh-huh.

20 Q. And is that, in fact --

21 MR. LUTTIER: Did you get that answer?

22 THE COURT REPORTER: Uh-huh.

23 BY MR. LUTTIER:

24 Q. -- is that in fact why you stopped going
25 to Mr. Epstein's, because you and [REDACTED] were

0217

1 leaving?

2 A. Yes.

3 Q. And where did you and [REDACTED] go?

4 A. To Rome, Georgia.

5 Q. And when I said, when I say that you went
6 there, did you physically move your residency to
7 start living there?

8 A. Obviously.

9 Q. And did you live with some relatives or
10 friends or something in Rome?

11 A. His relatives.

12 Q. And who would that have been?

13 A. His father and his aunt and uncle.

14 Q. When you left to go to Rome, Georgia, with
15 [REDACTED] in July of '03, did you know you were
16 pregnant?

17 A. No.

18 Q. When did you first learn you were
19 pregnant?

20 A. In August.

21 Q. Of '03?

22 A. Yes.

23 Q. And when you learned you were pregnant in
24 August of '03 for how long had you been pregnant?

25 A. I, actually I think we left in June because in

0218

1 August I had already been three months pregnant.

2 Q. Had you and Mr., not Mr. -- had you used
3 any drugs, nonprescription drugs between June of '03
4 and August of '03?

5 A. No.

6 Q. When was the last time you had used any
7 drug for which you didn't have a prescription?

8 That's a bad question.

9 A. I don't know.

10 Q. Starting in August of '03 and going back
11 in time, when was the last time?

12 A. Probably in the beginning of '03.

13 Q. Beginning of '03--

14 A. We left, we left --

15 Q. You mean January of '03?

16 A. No, if you would let me finish. We left the
17 State of Florida because we had a bad cocaine habit by
18 that point. With all the money that I received from
19 Mr. Epstein I could afford it. So, we had made a
20 decision to leave the State of Florida and I had been
21 clean for about a month and we couldn't handle it. So
22 we decided to leave the State of Florida so we wouldn't
23 have to worry about it anymore.

24 Q. So, if you left in June of '03 that means
25 your last use of cocaine would have been in May of

0219

1 '03?

2 A. May, June, yeah.
3 Q. And at that point in time, that is in May
4 of '03, what form of cocaine were you using?
5 A. Powder.
6 Q. As of May of '03, had you, had you ever
7 used crack cocaine?
8 A. No.
9 Q. From May of '03, or I should say after May
10 of '03, when you became aware that you were pregnant
11 in August of '03, did you use any drugs at all
12 during your pregnancy?
13 A. No. Other than nicotine.
14 Q. Say what?
15 A. Other than nicotine.
16 Q. And you had a healthy child born [REDACTED]
[REDACTED]?

18 A. Yes, I did.
19 Q. Born where, at what state, Florida or
20 Georgia?
21 A. In Florida.
22 Q. Was there a point in time that you and
23 [REDACTED] returned to Florida?
24 A. Yes.
25 Q. When was that?

0220
1 A. When I was eight months pregnant. So, in
2 February.
3 Q. Of '04?
4 A. Yeah.
5 Q. And, and why did you return to Florida?
6 A. Because it was too cold for my mother.
7 Q. And what did your mother have do with it?
8 A. My mother moved to Georgia with me when she
9 found out I was pregnant.
10 Q. And that would have been when?
11 A. Obviously --
12 Q. You, you found out you were pregnant in
13 August?

14 A. I was pregnant in August.
15 Q. Did you tell her that?
16 A. Yes. And she moved up there immediately. My
17 mom had moved up there because I thought I was pregnant
18 and she was there the day I took the pregnancy test.
19 Q. And did she live, literally live with you
20 and [REDACTED] or live in a separate place?
21 A. She had boughten (sic) her own place.
22 Q. And she stayed there from August of '03 to
23 February of '04 --
24 A. Yes.
25 Q. -- continuously?

0221
1 A. Yes.
2 Q. Were you, after [REDACTED], did you
3 remain -- strike that. Did you use any drugs,

4 illegal drugs after [REDACTED]?

5 A. Yes, I did.

6 Q. When was the first time you used an
7 illegal drug after March of '04?

8 A. When I turned 18.

9 Q. Which would have been --

10 A. January.

11 Q. January of --

12 A. '05.

13 Q. So, you were absolutely drug free, that is
14 you didn't use any illegal drug whatsoever from May
15 of '03 to January of '05?

16 A. Yes.

17 Q. Did you, during that period from May of
18 '03 to January '05 go to any kind of a drug
19 rehabilitation --

20 A. No.

21 Q. -- clinic? Did you have to seek any kind
22 of --

23 A. No.

24 Q. -- medical assistance to stop using drugs?

25 A. No.

0222

1 Q. Did you, did you use anything, patches or
2 any of the products that are available in the
3 general public to try to get off of drugs?

4 A. No.

5 Q. So, you were able on just strictly on your
6 own will --

7 A. Yeah.

8 Q. -- to stop using all drugs from May of '03
9 to January of '05?

10 A. Yes.

11 Q. How would you describe your life from July
12 of '03 when you, approximately when you moved to
13 Georgia through February of '04?

14 A. Frustrating.

15 Q. And why was it frustrating?

16 A. Because I had a lot of secrets that I had held
17 from [REDACTED] about Mr. Epstein, and I was just felt like I
18 was losing my mind.

19 Q. Did you seek any medical attention through
20 the period from July 3rd to February '04. July of
21 '03 to February '04?

22 A. Yes, when I was pregnant, yes, I did. I went
23 to a baby doctor.

24 Q. Did you seek any mental health treatment?

25 A. No.

0223

1 Q. You say you held secrets from [REDACTED]. What
2 secrets did you hold from [REDACTED]?

3 A. What exactly was happening at Mr. Epstein's
4 house.

5 Q. Well, you indicated that [REDACTED] took you to

6 Mr. Epstein's on more than one occasion?
7 A. But he didn't know what I was doing.
8 Q. When was the first time [REDACTED] took you to
9 Mr. Epstein's?
10 A. I don't know.
11 Q. But we know it wasn't the first or second
12 time, right?
13 A. Yeah.
14 Q. Because on those occasions you went with
15 Jane Doe No. 102?
16 A. He only, he only took me sometimes because
17 Mr. Epstein paid for either his drivers to pick me up
18 and drop me off or a Yellow Cab.
19 Q. Well, do you recall the first, the
20 incident the first time [REDACTED] took you?
21 A. What do you mean the incident?
22 Q. Well, do you recall what you told him
23 first time when you had him take you?
24 A. That I was going to clean his house.
25 Q. And what did [REDACTED] say in response?

0224

1 A. Okay.
2 Q. Did you, the next time that he took you,
3 did you tell him anything different?
4 A. No.
5 Q. Did there ever come a time that when [REDACTED]
6 took you to Mr. Epstein's you told him anything
7 other than you were going there to clean the house?
8 A. No.
9 Q. Did [REDACTED] ever ask you -- or, or strike
10 that. When [REDACTED] took you to Mr. Epstein's, did he
11 wait for you or did he come back?
12 A. He waited for me.
13 Q. And where did he wait?
14 A. Outside by the Intracoastal. It was in front
15 of the house the FBI was at.
16 Q. So, he didn't come in the house?
17 A. No.
18 Q. Did he ever meet Mr. Epstein?
19 A. Yes, he has.
20 Q. Did he ever have any discussions with
21 Mr. Epstein?
22 A. Yeah, about the Shelby Cobra that Mr. Epstein
23 has. My wires --
24 THE COURT REPORTER: The what?
25 THE WITNESS: Shelby Cobra. My wire is

0225

1 stuck in this chair.
2 MR. DANCHUK: Hold on.
3 MR. SCAROLA: Let's go off the record for
4 just a second, please.
5 (A brief recess was held.)
6 BY MR. LUTTIER:
7 Q. Were you present for any discussions

8 between [REDACTED] and Mr. Epstein?
9 A. Yes, I was.
10 Q. And where did they take place?
11 A. Outside in the driveway in front of the garage
12 that had all the cars.
13 Q. When was the last time you had contact
14 with [REDACTED]?
15 A. Thanksgiving.
16 Q. Of this year?
17 A. Yeah.
18 Q. And what did that contact consist of?
19 A. Eating turkey.
20 Q. Did you-all celebrate Thanksgiving
21 together?
22 A. Yes.
23 Q. You do.
24 A. We do. We celebrate every holiday together.
25 Q. And where was that?

0226

1 A. At my mother's house.
2 Q. Did you discuss with [REDACTED] this case?
3 A. Absolutely not.
4 Q. Has [REDACTED] ever discussed with you his
5 contact or discussions with Mr. Epstein?
6 A. Yes. He told me that you guys tried to hire
7 him.
8 Q. Who do you mean by "you guys"?
9 A. Mr. Epstein's law firms.
10 Q. Which firms are you talking about?
11 A. The ones that defend Mr. Epstein.
12 Q. Did you know how many law firms that is?
13 A. I have no idea. All I know is that his law
14 firms tried to hire my son's father.
15 Q. And when did he tell you that?
16 A. Last year.
17 Q. Meaning calendar year '08?
18 A. Yep.
19 Q. And was [REDACTED] incarcerated recently?
20 A. Yes, he was.
21 Q. And when was he incarcerated?
22 A. I believe it was -- was it -- I think it was
23 last year.
24 Q. That would be '08?
25 A. Yes.

0227

1 Q. When did he get released from
2 incarceration?
3 A. I don't know the date.
4 Q. So, did these lawyers that were trying to
5 hire him go meet him in jail? Is that what you are
6 saying?
7 A. I don't know. Mr. Epstein was in jail with
8 him.
9 Q. So, Mr. Epstein and [REDACTED] met each

10 other while they were both incarcerated in the same
11 institution?

12 A. No. Mr. [REDACTED] and Mr. Epstein, or [REDACTED]
13 and Mr. Epstein met each other while I was still going
14 to Mr. Epstein's house, but then again met while they
15 were incarcerated together.

16 Q. Did [REDACTED] ever share with you what he told
17 Mr. Epstein about you?

18 A. No.

19 Q. Did he ever tell you that he discussed you
20 with Mr. Epstein?

21 A. Yes.

22 Q. But he didn't tell you what he said?

23 A. No.

24 Q. Did he ever tell you what he said about
25 what information you knew about Mr. Epstein before

0228

1 you went --

2 A. No.

3 Q. -- to see him the first time? Did he ever
4 tell you about what you told the other girls before
5 you took them to Mr. Epstein's?

6 A. No.

7 Q. Did he ever tell you that he attempted to
8 get employment from Mr. Epstein?

9 A. Yes.

10 Q. And what did he tell you Mr. Epstein said
11 in response to that?

12 A. I have no idea. But if you would like to let
13 me know, go ahead.

14 Q. Is [REDACTED], as far as you know, an
15 honest person?

16 A. No.

17 Q. He is not honest?

18 A. Absolutely not.

19 Q. So you wouldn't believe what he says?

20 A. No. Would you?

21 Q. No meaning that my statement is correct,
22 you would not believe what he says?

23 A. That's what I am saying.

24 Q. So, you don't really believe the statement
25 he made to you that, what somebody tried to hire --

0229

1 A. No, I believe that you guys tried to hire him.

2 Q. How do you decide which statements he
3 makes you believe and which you don't?

4 A. He showed me the address.

5 Q. The address of what?

6 A. Your guys's law firm.

7 Q. Well, you keep saying, you guys. What
8 firm is that?

9 A. The attorneys on Mr. Epstein's side off of
10 Flagler Drive.

11 Q. And did he tell you, did [REDACTED] tell

12 you that he came to meet with those lawyers?

13 A. Yes, he did.

14 Q. Did he tell you whether or not every
15 single word he said had been recorded?

16 A. I have no idea. He didn't tell me anything
17 about it.

18 Q. Did he tell you who-all was present at the
19 meeting?

20 A. No, he didn't.

21 Q. He didn't tell you anything about what he
22 said at that meeting, did he?

23 A. No.

24 Q. And in particular he didn't say what he
25 said about you, did he?

0230

1 A. No.

2 Q. You didn't ask him either, did you?

3 A. I did and he wouldn't tell me.

4 Q. Did you wonder why he wouldn't tell you
5 what he had told Mr. Epstein's lawyers about you?

6 A. No, and I could really care less because he
7 didn't go through half the traumatic things I did with
8 Mr. Epstein.

9 Q. Well, what traumatic things did you go
10 through?

11 A. Well, being that I was an underage girl with
12 an old man masturbating in front of me and bribing me
13 with hundreds and hundreds of dollars --

14 Q. And how did that, how did that result in
15 any injury to you?

16 A. Well, my mental stability is nothing like it
17 used to be before I met Mr. Epstein.

18 Q. What do you mean by mental stability?

19 A. I'm scared to go places by myself. I have
20 trust issues with people now. I don't like when older
21 guys stare at me.

22 Q. Well, after you worked -- anything else?

23 A. Oh, no, you can go ahead.

24 Q. No, I want to get all your injuries that
25 you claim you have suffered as a result of going to

0231

1 Mr. Epstein's. Anything else?

2 A. You may continue.

3 Q. Is there anything else or have you now
4 told me everything and I will go back and ask you
5 about it?

6 A. You can continue asking me questions.

7 Q. Is there any other way you suffered any
8 damage as a result of going to Mr. Epstein other
9 than your mental stability is not the same, you're
10 scared to go places by yourself, that older guys,
11 you don't like it when older guys stare at you.

12 A. I have trust issues.

13 Q. Trust issues. Anything else?

14 A. I don't know right now.
15 Q. Do you know of any way you suffered any
16 damage?
17 A. What?
18 MR. SCAROLA: Well, you have already heard
19 repeatedly --
20 MR. LUTTIER: No speaking -- Other than
21 what you have told me in this deposition.
22 MR. SCAROLA: That's fine.
23 BY MR. LUTTIER:
24 Q. Okay. Is that it?
25 A. Yeah, that's it.

0232

1 Q. Okay. Now, what do you mean when you say
2 you have trust issues.
3 A. Exactly what I said.
4 Q. Well, I don't understand that. Explain
5 that. Explain that to me. What do you mean you
6 have trust issues?
7 A. I have trust issues with people.
8 Q. Meaning what, you can't trust people?
9 A. No, I can't.
10 Q. Anybody?
11 A. Guys particularly.
12 Q. Males?
13 A. Males, older males.
14 Q. Any males, older males?
15 A. Yes.
16 Q. What age male does it have to be for you
17 not to be able trust them?
18 A. Older than myself.
19 Q. So, any man that is older than you, you
20 don't feel like you can trust him?
21 A. No.
22 Q. How has that impacted you in your daily
23 life?
24 A. Well, I go outside and there is men
25 everywhere.

0233

1 Q. Okay. So, what effect does that have on
2 you? You can't trust the people --
3 A. Exactly --
4 Q. -- according to you?
5 A. -- it. I can't trust nobody.
6 Q. So, you're not asking them to do anything
7 or do anything for you, are you?
8 A. No, because I don't want them to.
9 Q. Okay. So, help me understand how has this
10 impacted you at all that you claim you can't trust
11 men that are older than you?
12 A. Because I can't trust them. What else do you
13 want me to say?
14 Q. Well, I want you to describe how --
15 A. I can't --

16 Q. How your damage -- what is it that you
17 want these men to do --

18 A. Nothing, I don't want them to do anything.

19 Q. -- that -- wait a minute.

20 A. I want them all to leave me alone.

21 Q. What is it that you want these men to do
22 that you can't trust them to do?

23 A. There is nothing that I don't want, that I
24 want them to do.

25 Q. Have you ever asked a man older than you
0234

1 to do something?

2 A. Other than my attorneys, no.

3 Q. All right.

4 A. No offense to you guys.

5 Q. So, there has never been an occasion since
6 you last went to Mr. Epstein where you asked a man
7 that was older than you to do something and you
8 counted on trusting them?

9 A. I counted -- well, my attorneys, but that's
10 it.

11 Q. Okay. But there has never been a time
12 that you've placed your trust --

13 A. I refuse --

14 Q. Wait a minute.

15 A. No, I don't let them, allow them.

16 Q. Now, so, you haven't even attempted to,
17 quote, to use your words, trust a man that's older
18 than you since you last saw Mr. Epstein; is that
19 correct?

20 A. Yes. That's correct.

21 Q. Now, when you say trust, do you mean you
22 don't want to be in their physical presence?

23 A. I don't, no, I don't want to be in their
24 physical presence.

25 Q. But in fact as you testified earlier, you
0235

1 worked for at least two escort services where you
2 have gone out and been paid to be in the presence of
3 men older than you, correct?

4 A. Correct.

5 Q. Didn't feel like you were in any kind of
6 danger, right?

7 A. No, sometimes I did. And I already told you
8 those times.

9 Q. Well, you wouldn't have gone if you
10 thought you were in any danger, would you?

11 A. Exactly.

12 Q. Okay. So there were many occasions that
13 the driver came and got you, and you were going out
14 with somebody at the escort services where they were
15 older than you and you had no fear of anything;
16 isn't that right?

17 A. Yes.

18 Q. By the way, when you worked for these
19 escort services, would they call you up and tell you
20 on such-and-such a day there is somebody that wants
21 to go out with you? Is that how it was done?

22 A. Yes.

23 Q. What would they tell you about the person
24 that wanted to go out with you, if anything?

25 A. They would tell me where, what the occasion

0236

1 was, what I would be doing, what kind of wear I would
2 have to wear, formal, outside, the type of dress I
3 needed to wear.

4 Q. Did they -- well, what specifically did
5 they tell you about what you had to wear? Did they
6 tell you, describe what kind of clothes or just--

7 A. I just said formal.

8 Q. But did they say, for example, wear
9 something that's low cut or don't wear a bra or, you
10 know, wear this or wear that?

11 A. No.

12 Q. Or this is just a formal or this is a
13 semi-formal occasion?

14 A. It's a formal or semi-formal for the fourth
15 time now I am telling you. So I am done answering
16 questions about that.

17 Q. What else did they tell you other than
18 what to wear?

19 A. Nothing.

20 Q. Did they tell you anything at all about
21 the person with whom you would be going out?

22 A. Sometimes.

23 Q. And with what degree of frequency would
24 they tell you about the person that you were going
25 out with? Did they always do that?

0237

1 A. Sometimes. I just said sometimes.

2 Q. More than half the time?

3 A. Sometimes. If it was --

4 Q. More than half --

5 A. -- more than half the time, I would have said
6 more than half the time, but it's sometimes.

7 Q. So that was --

8 A. Sometimes yes and sometimes no, sometimes.

9 Q. Would you estimate that it was less than
10 half the time?

11 A. I'm not answering that question seriously
12 because I have said sometimes.

13 Q. Describe sometimes to me by percentage.

14 A. I don't know the percentage of sometimes.
15 Sometimes.

16 Q. Well, let's -- we all know what 50 percent
17 is, right?

18 A. So 50 percent. There you go. There is your
19 sometimes.

20 Q. Don't let me put words in your mouth,
21 ma'am. You were there, not me.

22 A. I said sometimes.

23 Q. If you could just tell me if it was more
24 or less than 50 percent of the time?

25 MR. SCAROLA: And you have been told
0238

1 repeatedly that she is unable to do that for
2 you.

3 BY MR. LUTTIER:

4 Q. So, how can you quantify for me by
5 definition your phrase sometimes?

6 MR. SCAROLA: And the answer to that
7 question is she's been unable to. So we're
8 sorry that we can't give you more specific
9 information. But "sometimes" obviously means
10 more than once and less than always.

11 THE WITNESS: So you figure it out.

12 BY MR. LUTTIER:

13 Q. Well, now, ma'am, it would be hard for me
14 to do that. I wasn't there. So, it could have been
15 as much, according to your definition, as 99 percent
16 of the time, right?

17 MR. SCAROLA: At this point those
18 questions are annoying, embarrassing, and
19 harassing, and I will instruct the witness not
20 to answer.

21 BY MR. LUTTIER:

22 Q. What else, if anything, were you told
23 about the individuals that you were going to be
24 going out with when you were working for the escort
25 services?

0239

1 A. What does this have to do with the original
2 question at hand?

3 Q. If you can just answer my question now.

4 A. And I already told you what they would tell
5 me.

6 Q. Were you told anything else?

7 A. No.

8 Q. Were you told the person's name?

9 A. Yes.

10 Q. All right. Were you told the person's
11 name each time?

12 A. Yes.

13 Q. All right. So there's a piece of
14 information that you got every time. Were you told
15 the person's age?

16 A. No.

17 Q. Ever?

18 A. No.

19 Q. Did you tell the people at the escort
20 service that you only wanted to go out with people
21 of a certain age bracket?

22 A. No.
23 Q. You had to -- it was like a come and take
24 all? You had to go out with whoever they said?
25 A. Yes.
0240
1 Q. Did you have the right to say no to
2 somebody?
3 A. Yes.
4 Q. Did you ever, did they ever call you and
5 say they had someone for you to go out with and you
6 said, no, I don't want to go out with them?
7 A. No.
8 Q. So everybody that was ever, I will say
9 offered to you, you accepted?
10 A. Yes.
11 Q. What's your best estimate about how many
12 escorts you had between these two escort services?
13 A. I don't know.
14 Q. More than 50?
15 A. No.
16 Q. More than 25?
17 A. No. About 25 people.
18 Q. Were you told the person's race?
19 A. Yes.
20 Q. Did you give the escort service any
21 criteria about the type of person you would agree to
22 go out with?
23 A. Yes.
24 Q. What criteria did you give them?
25 A. I wouldn't go out with black guys because
0241
1 black people are abusive and controlling. And I have, I
2 just felt unsafe. And I would only go out with people
3 that didn't want sex or anything sexual.
4 Q. So you said no black guys and you said no
5 one that wants anything, sex or anything that's
6 sexual?
7 A. Yes.
8 Q. Did you have to describe for the escort
9 service --
10 A. No, I didn't.
11 Q. -- what you meant by sexual?
12 A. Anybody in their right mind what know what
13 sexual and sexual things are.
14 Q. So, you didn't give them any age bracket,
15 right?
16 A. No.
17 Q. You didn't give them a weight bracket,
18 correct?
19 A. No.
20 Q. And on how many occasions did you have men
21 that you went out with that were older than you?
22 A. Every time.
23 Q. Did you ever have to seek any kind of

24 medical care or attention after going out with one
25 of these individuals that was provided through an

0242

1 escort service?

2 A. No.

3 Q. Did you ever seek any kind of mental
4 health counseling?

5 A. No.

6 Q. Or mental health services as a result of
7 having gone out with anyone through the escort
8 service?

9 A. No.

10 Q. Were you ever physically hurt in any
11 manner whatsoever as a result of going out with
12 anyone through one of these escort services?

13 A. Would that qualify under me having to seek
14 medical attention?

15 Q. No. Were you ever hurt in any manner as a
16 result of going out with anyone through any of these
17 escort services?

18 A. No.

19 Q. After you quit going to Mr. Epstein's, did
20 you work at one or more topless bars or
21 establishments?

22 A. No.

23 Q. Have you ever worked at a topless
24 establishment?

25 A. I was a stripper for one night.

0243

1 Q. And where?

2 A. For three hours, not even.

3 Q. Where was that?

4 A. I don't remember the name. I think it was
5 Platinum Showgirls or something.

6 Q. And when was that?

7 A. I don't remember the year.

8 Q. Was it after Mr. Epstein?

9 A. Yes. I left because I felt degraded.

10 Q. During the time that after you left --
11 strike that. After you last went to Mr. Epstein
12 which you say is in August of '03, did you have a
13 normal sexual relationship with [REDACTED]?

14 A. No.

15 Q. Were you having sex with him as frequently
16 as twice a day?

17 A. No.

18 Q. Have you ever told anyone that that's what
19 you did?

20 A. No.

21 Q. Was there ever a time that you had sex
22 with [REDACTED] twice a day?

23 A. Yes.

24 Q. When was that?

25 A. Before Mr. Epstein.

0244

- 1 Q. And when did it change?
2 A. When I started going to Mr. Epstein's.
3 Q. And what did it change to?
4 A. To once or twice a week.
5 Q. And why did it change?
6 A. Because I felt disgusting.
7 Q. Did there ever come a time after you went
8 to Mr. Epstein's that you resumed having sexual
9 relationships with the same degree of frequency with
10 [REDACTED] or anyone else?
11 A. With what?
12 Q. With [REDACTED]?
13 A. What do you mean?
14 Q. Did there ever come a time --
15 A. That I went back to the same --
16 Q. Right.
17 A. No.
18 Q. Did you have sexual relationships with
19 [REDACTED]?
20 A. Yes.
21 Q. And you met him after Mr. Epstein, right?
22 A. (Witness nods head.)
23 Q. Did you have a normal sexual relationship
24 with him?
25 A. Yes.

0245

- 1 Q. With what degree of frequency did you have
2 sex with him?
3 A. Once, twice, or three times a week.
4 Q. As often as you wanted it?
5 A. As often as I could stand it.
6 Q. Did you have it as often as he wanted it?
7 A. No.
8 Q. Did you have a baby with him as well?
9 A. Yes.
10 Q. And the baby that you had with [REDACTED], that
11 baby's name is what?
12 A. [REDACTED].
13 Q. And have you what is known as relinquished
14 your parental rights for [REDACTED]?
15 A. No, but I see my son as often as I would like.
16 And as fast as I get out of here is as fast as I can go
17 pick him up.
18 Q. You say you did not relinquish your
19 parental rights?
20 A. I did not.
21 Q. Was [REDACTED], that is your son, ever taken
22 away from you?
23 A. I signed my parental rights over to his
24 aunt --
25 Q. Okay. Well, that's what I meant by the

0246

- 1 word--

2 A. -- for his financial stability.
3 Q. Maybe you didn't understand what I meant
4 by the word relinquished. Did you ever give up or
5 sign away your parental rights to your son, [REDACTED]?

6 A. Yes, I did.

7 Q. Would you explain the facts and
8 circumstances surrounding you doing that?

9 A. I was not financially stable enough to take
10 care of him.

11 Q. And how about [REDACTED], your boyfriend, the
12 father of your son?

13 A. He doesn't have rights to him either.

14 Q. And was there a legal proceeding brought
15 to get that accomplished?

16 A. Yes, there was.

17 Q. And who brought that legal proceeding?

18 A. What do you mean who brought that?

19 Q. Who, who filed, who was the moving party?
20 Did DCF bring that proceeding?

21 A. Yes.

22 Q. And as part of that proceeding, did DCF
23 tell you that they were going to take away your
24 parental rights if you didn't sign them off?

25 A. No.

0247

1 Q. And was that action brought here in Palm
2 Beach County?

3 A. Yes.

4 Q. And isn't it true that you, that DCF told
5 you you had no choice but to either voluntarily sign
6 over your rights, or they were going to take your
7 son?

8 A. No.

9 Q. What did they tell you about what your
10 choices were?

11 A. They told me I had to go through classes and
12 all kinds of things. But I still, whether I did the
13 class or not, I wouldn't have been financially stable
14 enough to take care of my son. So, I signed my rights
15 over to his aunt who was financially able to take care
16 of my child.

17 Q. And you, in fact, had gone to court and
18 gotten a child support award from [REDACTED], had you
19 not?

20 A. A child support order?

21 Q. An award of child support from, from
22 [REDACTED]. You filed a judicial action and made a
23 complaint against him said you wanted child support?

24 A. That's when I still had my son, yes.

25 Q. All right. So, so, and the court entered

0248

1 an order that said he had to pay you a certain
2 amount of child support, right?

3 A. Which he never did.

4 Q. Did that child support ever come to your
5 mother, for example?

6 A. We never got child support from [REDACTED].

7 Q. Did you ever have a complaint that your
8 mother was taking your child support?

9 A. No.

10 Q. Did you ever complain to anyone that your
11 mother was taking your child support?

12 A. No.

13 Q. And your daughter's name is what?

14 A. [REDACTED].

15 Q. Well, is it, is it --

16 A. [REDACTED].

17 Q. Does it cause you any kind of upset that
18 you have signed over your parental rights to your
19 son [REDACTED]?

20 A. Of course I am upset about it, but I did what
21 was best for him.

22 Q. Do you have parental rights for your
23 daughter [REDACTED]?

24 A. No, I do not. I signed my rights over to her
25 grandmother.

0249

1 Q. And did DCF bring an action to take away
2 your parental rights in that case?

3 A. They tried.

4 Q. And as a result of that did you
5 voluntarily relinquish your rights?

6 A. Yes, I did.

7 Q. And again did DCF insist that in order for
8 you to see your child, you would have to do certain
9 things?

10 A. Yes.

11 Q. And did you decide that what you would do
12 is sign over parental rights rather than do those
13 things?

14 A. No, I, I did some of the things that I was
15 supposed to do.

16 Q. Do you know what a performance agreement
17 is?

18 A. No.

19 Q. Did you do all the things that DCF said
20 you had to do?

21 A. Everything except for domestic violence class.

22 Q. And did DCF say that as a result of you
23 not doing everything, they were going to take your
24 child away?

25 A. They said they were going to terminate my

0250

1 rights, so I signed my parental rights over to [REDACTED]

2 [REDACTED].

3 Q. So, in both the situation involving your
4 son and your daughter, DCF had told you --

5 A. Yes.

6 Q. -- before you signed over your rights that
7 they were going to terminate your rights?

8 A. Yes.

9 Q. And is it also distressing to you that you
10 had to relinquish your rights to your daughter

11 [REDACTED]?

12 A. Of course it's distressing.

13 Q. And where does [REDACTED] live?

14 A. In Texas.

15 Q. How often do you see her?

16 A. Once a month.

17 Q. And how is it that you see her?

18 A. Her grandmother brings her here.

19 Q. And [REDACTED] father is a guy name

20 [REDACTED]?

21 A. No. His first name is [REDACTED].

22 Q. What's his last name?

23 A. [REDACTED].

24 Q. Now, has [REDACTED] [REDACTED] ever been
25 violent to you?

0251

1 A. Yes.

2 Q. When was he violent to you?

3 A. When I was pregnant.

4 Q. What did he do?

5 A. He slapped me.

6 Q. And where were you when that happened?

7 A. At a restaurant.

8 Q. Was that distressful to you?

9 A. Yeah.

10 Q. Upset you at the time?

11 A. Obviously.

12 Q. Was, was that the first time a man had
13 been physically violent towards you?

14 A. No.

15 Q. Who was the first person --

16 A. [REDACTED].

17 Q. -- that was physically violent? And what
18 did [REDACTED] do to you that was vio -- physically
19 violent?

20 A. He held a gun to my head.

21 Q. And when was that?

22 A. I don't remember the time and day.

23 Q. Was that before you went to Georgia?

24 A. Yes.

25 Q. And was that while you were going to

0252

1 Mr. Epstein?

2 A. Yep, it was while I was going to

3 Mr. Epstein's.

4 Q. And was, did he hold a gun to your head
5 because he thought you had been cheating on him?

6 A. Yeah, but not with Mr. Epstein.

7 Q. And had you, in fact, been cheating on

8 him?
9 A. No. He was cheating on me with [REDACTED].
10 Q. That is he had sexual relations with [REDACTED],
11 your best friend?
12 A. Yes, yes.
13 Q. And when did that happen?
14 A. I don't know the time and date.
15 Q. While you were going to Mr. Epstein?
16 A. Yes.
17 Q. Did you know that your then boyfriend,
18 [REDACTED], had had sexual relations with your
19 best friend, [REDACTED], before you took her to
20 Mr. Epstein's?
21 A. No.
22 Q. Did you ever discuss with [REDACTED] the fact
23 that she had had sex with your boyfriend?
24 A. Yes.
25 Q. And what was her response?
0253
1 A. She was sorry.
2 Q. And have you two mended your ways since
3 then?
4 A. Absolutely not.
5 Q. You no longer associate with her?
6 A. Hell, no.
7 Q. And is it because that you're upset that
8 she had sex with [REDACTED] while you were dating
9 him?
10 A. Yeah.
11 Q. Is there any other reason? Was there any
12 other rift between the two of you?
13 A. No.
14 Q. Did, did you and she have this
15 confrontation before you stopped going to see
16 Mr. Epstein?
17 A. Yes.
18 Q. And as a result of [REDACTED] having
19 sexual relations with [REDACTED], did you have sexual
20 relations with somebody else?
21 A. Yes, I did.
22 Q. Who did you have sex with?
23 A. [REDACTED] best friend.
24 Q. Sort of like as they say, what's good for
25 the goose is good for the gander?
0254
1 A. A tit for a tat. Yes, it was.
2 Q. And who was [REDACTED] best friend.
3 A. [REDACTED].
4 Q. What's [REDACTED] last name?
5 A. I don't remember.
6 Q. Is the person you had sex with you, you
7 can't remember his last name?
8 A. I can't remember his last name. I'm sorry.
9 Q. Did you have -- have you had sex with more

10 than one person whose name you can't remember?

11 A. No.

12 Q. [REDACTED] the only person?

13 A. I can't remember his last name.

14 Q. Well, you recently filed some answers,
15 some amended answers to interrogatories. Let me --

16 MR. LUTTIER: What number are we on?

17 THE COURT REPORTER: Four.

18 THE WITNESS: Exhibit 4.

19 MR. LUTTIER: These are, I think, Jack,
20 are the ones I was talking about.

21 BY MR. LUTTIER:

22 Q. Let me show you what's been marked as
23 Exhibit 4 which purport to be your Third Amended
24 Answers to Defendant's Interrogatories. These do
25 not contain a signature by you. So I would like you

0255

1 to look at those, and tell me if the answers are
2 true and correct and complete.

3 A. Yeah, those are the people that I have had sex
4 with in my life.

5 Q. Okay. Well, you have answered --

6 A. I didn't put [REDACTED] name. Would you like me
7 to reapply it?

8 Q. You actually answered one, two, three.
9 You have three answers that you have amended here.
10 So, I want you to look at all three, and now while
11 you're under oath, I am going to ask you if these
12 answers are true and correct and if they are
13 complete.

14 So, if you need to take some time, fine.
15 When you're done, let me know and I'll --

16 A. Yeah, they're all right.

17 Q. Okay. With, with the following exception,
18 right, in 18, in answer to 18 there should be
19 another person's name, [REDACTED] somebody?

20 A. Yep.

21 Q. And where would he fit in in terms of the
22 chronology here?

23 A. Between [REDACTED] and [REDACTED].

24 Q. Now, you said that you dated [REDACTED] -- I
25 don't know where it is -- from 2001 to 2005. In

0256

1 your answers to interrogatories, you indicate that
2 you had sexual intercourse with [REDACTED] when
3 you were 15 to 16 years old?

4 A. So --

5 Q. So, does this mean that you had sex with
6 [REDACTED] while you were dating [REDACTED]?

7 A. Yes.

8 Q. Did [REDACTED] know about that?

9 A. Yes.

10 Q. Did you tell him about it before it
11 happened?

12 A. No.
13 Q. How did it happen that you had sex with
14 [REDACTED] while you were dating [REDACTED]?
15 A. [REDACTED] went to Georgia.
16 Q. Okay. So --
17 A. So, [REDACTED] went to Georgia.
18 Q. He went to Georgia without you?
19 A. Obviously.
20 Q. When did he go to Georgia in relationship
21 to the testimony --
22 A. To see--
23 Q. -- you gave me earlier --
24 A. To see --
25 Q. -- that you went there in June of '03?

0257

1 A. He went with his family when we first started
2 dating like, well, towards the first year we were
3 dating.
4 Q. Before you went and saw Mr. Epstein?
5 A. Yeah.
6 Q. All right. So the sex that you had with
7 [REDACTED] is sex that you had prior to the
8 time that you first met Mr. Epstein?
9 A. No.
10 Q. When you say that you dated [REDACTED] from
11 January, from '01 to '05 and that that was
12 continuous --
13 A. Right.
14 Q. Was he living in Georgia part of the time?
15 A. No. He went there on vacation.
16 Q. Okay. So how long was he gone for this
17 vacation?
18 A. I don't remember. Like a week.
19 Q. All right. So, while he was gone on
20 vacation for a week during the period of time that
21 you were dating him between 2001 and 2005, you had
22 sexual relations with [REDACTED]?
23 A. Yes, I did.
24 Q. And, and did you tell [REDACTED] about it after
25 the fact?

0258

1 A. Yes.
2 Q. And that wasn't any problem for you? You
3 didn't have any trust issues with [REDACTED] at the
4 time?
5 A. No, I didn't have trust issues with [REDACTED].
6 Q. So, by, by your acknowledgment in these
7 answers to interrogatories before you ever went to
8 Mr. Epstein's house the first time, you had had
9 sexual relations with [REDACTED], [REDACTED]
10 [REDACTED], [REDACTED], and somebody whose last name you
11 can't remember, and --
12 A. And that's it.
13 Q. And [REDACTED]?

14 A. No.
15 Q. Not [REDACTED], but up through [REDACTED]?
16 A. Yes.
17 Q. And, and the, the relationship you
18 testified about earlier with [REDACTED]. Now, during this
19 period of time with [REDACTED] between '01 and
20 '05, tell me about what the facts and circumstances
21 were surrounding him holding a gun to your head?
22 A. He cheated on me with [REDACTED], and I suppose he
23 felt guilty about it. So, he tried to say I was
24 cheating on him and I wasn't cheating on him. He was
25 cheating on me and felt guilty, and then decided he was
0259

1 going to try to kill me.
2 Q. And you were afraid -- where were you when
3 this gun was held to your head?
4 A. In the middle of a field.
5 Q. Where?
6 A. In West Palm Beach.
7 Q. And you were fearful at that time that he
8 might shoot you?
9 A. Obviously.
10 Q. Well, can -- would you agree that it was a
11 traumatic event to you to have somebody hold a gun
12 to your head?
13 A. Wouldn't it be for you?
14 Q. I would assume so.
15 A. Yeah.
16 Q. As they say you see your life flash before
17 your eyes?
18 A. I guess.
19 Q. Did you ever seek any kind of counseling
20 or treatment for that traumatic event?
21 A. No.
22 Q. Had anyone else ever threatened your life
23 other than [REDACTED] as of that time?
24 A. No.
25 Q. Has anyone ever threatened your life since
0260

1 that event?
2 A. No.
3 Q. Have you ever been affiliated with a gang?
4 A. No.
5 Q. Have any of the individuals that you have
6 dated ever been affiliated with a gang?
7 A. No.
8 Q. Have you been present when [REDACTED]
9 claimed that he was affiliated with a gang?
10 A. Nope.
11 Q. Have you told others that you cannot
12 answer the question about whether you're affiliated
13 with a gang because if you did, it would risk
14 personal harm to you?
15 A. No. I said I can't speak for anybody else if

16 they're in a gang because I don't know about it. And if
17 they were in a gang, it's none of my business to let
18 anybody else know about it. I can't tell somebody
19 something about somebody else if I don't know if it's
20 true or not.

21 Q. Have you ever participated in any gang
22 membership ritual?

23 A. No.

24 Q. For approximately how long did the event
25 take place that [REDACTED] held a gun to your head?

0261

1 A. Like five minutes and then we kissed and made
2 up and had sex.

3 Q. In the field?

4 A. Yep.

5 Q. Isn't it a fact that you told [REDACTED]
6 that he held a gun on your head for a good hour?

7 A. No. We were arguing for an hour. He didn't
8 hold the gun to my head for an hour. That doctor is on
9 some other shit.

10 Q. And you genuinely feared that you were
11 going to die on that occasion, did you not?

12 A. Well, somebody holds a gun to your head, I am
13 pretty sure that anybody would feel that they are going
14 to die.

15 Q. Was there another occasion that [REDACTED]
16 [REDACTED] was physically violent towards you?

17 A. Yes.

18 Q. When was that?

19 A. When he tried to drown me in a canal.

20 Q. When was that?

21 A. I don't recall.

22 Q. Was it before you went to Georgia or
23 after?

24 A. Before.

25 Q. Was it while you were going to

0262

1 Mr. Epstein's?

2 A. Yep.

3 Q. Did you tell Mr. Epstein about it?

4 A. Yes, I did.

5 Q. And when did you tell Mr. Epstein about
6 it?

7 A. On one of the occasions I went to his house.

8 Q. And what did he say?

9 A. I don't know. He talked to me about it.

10 Q. Was he sympathetic toward you?

11 A. A little bit.

12 Q. Did you tell you you ought to get away
13 from this guy?

14 A. Yeah.

15 Q. Did you pay attention to what he said?

16 A. Obviously not, if I had a kid with him some
17 years later.

18 Q. You elected not to sever your relationship
19 with [REDACTED], correct?
20 A. What? I wasn't going to leave [REDACTED].
21 Q. Voluntary decision on your part, right?
22 A. I love [REDACTED].
23 Q. Nobody --
24 A. I still love [REDACTED].
25 Q. Nobody forced you into it.
0263
1 Big girl, you made your own decision, correct?
2 A. And I had stayed with [REDACTED], yes.
3 Q. And let's talk a little bit more about it.
4 When you say he tried to drown you, exactly what did
5 he do?
6 A. Stuck my head in canal water.
7 Q. And where was this canal?
8 A. On the street where any canal would be.
9 Q. Where, in, in West Palm Beach?
10 A. Yes.
11 Q. And what was the event that led to him
12 sticking your head in canal water?
13 A. I have absolutely no idea.
14 Q. And were you terrified?
15 A. A little.
16 Q. How long did he hold your head under
17 water?
18 A. I'm -- I wasn't looking at my watch.
19 Q. Were you running out of breath?
20 A. No. He was lifting me back up. I caught my
21 breath.
22 Q. So, he was dunking you in and out of
23 water?
24 A. Yeah.
25 Q. So, you didn't ever have to fight to get
0264
1 up and get your head out of water?
2 A. While I was trying to fight to get my head out
3 of the water, the whole time he was trying to drown me.
4 Q. Were you fighting with him at the time?
5 A. We were in an argument.
6 Q. Was it a traumatic event to you?
7 A. Kind of.
8 Q. Did you seek any type of counseling or --
9 A. No.
10 Q. -- medical care.
11 THE WITNESS: What time is it?
12 MR. SCAROLA: We're getting close.
13 MR. LUTTIER: 4:32.
14 MR. SCAROLA: Less than a half hour.
15 THE WITNESS: Thank God. 30 more minutes
16 of this crap. These things are really good.
17 BY MR. LUTTIER:
18 Q. When you met with the FBI and the U.S.
19 Attorney --

20 A. Yes.
21 Q. -- did you tell them that you had worked
22 for escort services?
23 A. I don't think so. I don't remember.
24 Q. Did you tell them that you had been
25 sexually active prior to the time that you went to
0265
1 Mr. Epstein's?
2 A. I don't remember.
3 Q. Did you tell them that you had been raped
4 before you went to Mr. Epstein's?
5 A. I don't remember.
6 Q. Did you tell them that you had been
7 molested by your grandfather?
8 A. I don't remember.
9 Q. Tell them that you had been molested by
10 your cousin?
11 A. I don't remember.
12 Q. Did you tell them about your relationship
13 with [REDACTED]?
14 A. I don't remember.
15 Q. Did you tell them about physical violence
16 that had been inflicted upon you by [REDACTED] or by
17 [REDACTED]?
18 A. I don't remember. They more wanted to know
19 about what happened with the child molester.
20 Q. Other than the occasion when [REDACTED]
21 slapped you while you were pregnant, was
22 [REDACTED] ever physically violent with you?
23 A. Nope.
24 Q. Was there ever an occasion that the police
25 came to visit you and [REDACTED] when you had
0266
1 your child with you?
2 A. Other than the time you mean that my child was
3 born?
4 Q. No. When they came to where you were
5 living and your child was there with you.
6 A. We had gotten in a fight with my brother and
7 his girlfriend. And after the fight was over, I went a
8 got my daughter from the neighbor's house.
9 Q. Did the police come?
10 A. Yes.
11 Q. Was there ever a time that the police came
12 when your child was there and they found drug
13 paraphernalia or drugs on either you or
14 [REDACTED]?
15 A. Drug paraphernalia?
16 Q. Or drugs.
17 A. No.
18 Q. Was there ever a time that [REDACTED]
19 was arrested in your presence because he had drugs
20 on his possession.
21 A. I have no idea.

22 Q. Were you ever present when [REDACTED]
23 was arrested?
24 A. Yeah.
25 Q. How many times?
0267
1 A. I don't recall.
2 Q. More than once?
3 A. I don't remember.
4 Q. And what is your current relationship with
5 [REDACTED]?
6 A. I don't talk to him. He is incarcerated.
7 Q. And why is he incarcerated?
8 A. Because he beat up his pregnant girlfriend.
9 Q. And, and the pregnant girlfriend would be
10 who.
11 A. I don't know her name and I could care less
12 about the bitch.
13 Q. You say what? You could careless about
14 what?
15 A. About the bitch.
16 Q. Okay. Did you know the girl?
17 A. I have no idea who she is.
18 Q. You mentioned the name earlier in the
19 deposition, [REDACTED]?
20 A. Uh-huh. That was the missing Jane Doe No.
21 102's, whatever Jeffrey did with her, boyfriend.
22 Q. When did you first meet [REDACTED]?
23 A. A couple of weeks before I saw Mr. Epstein for
24 the first time. That was Jane Doe No. 102's boyfriend.
25 Q. When was the last time you spoke with
0268 [REDACTED]?
1 A. A couple of days after Jane Doe No. 102 went
2 missing.
3 Q. Now, earlier you were making reference to
4 injecting drugs and I asked you a question about, I
5 don't remember if I asked you about a needle or a
6 syringe, so I need to go back and clarify. Was it
7 your testimony that you were able to go to a drug
8 store without a prescription and purchase a syringe
9 with a needle on it?
10
11 A. Yes.
12 Q. And what drug store was that?
13 A. One that sells them.
14 Q. Would that be a drug store here in Palm
15 Beach County?
16 A. It's a drug store in every county.
17 Q. Did you purchase a syringe with a needle
18 here in Palm Beach County --
19 A. Yes.
20 Q. -- without a prescription?
21 A. Yes.
22 Q. Do you have any prescription that allows
23 you to, specifically for hypodermic needles?

24 A. You don't need one.
25 Q. Are you diabetic or anything like that?
0269
1 A. No.
2 Q. Have you ever used a needle that had been
3 used before?
4 A. Not by anybody else, no.
5 Q. Not my question?
6 A. No, I have never shared a needle, no.
7 Q. Did you ever use --
8 A. No.
9 Q. You need to listen to my question.
10 A. I heard you. You asked me if I ever used a
11 needle that's been used before and I said no.
12 Q. And what you said was, not one that had
13 been used by somebody else. So, which leaves open
14 the possibility, have you ever used a needle that
15 had been used before, even if it was used on you?
16 A. Even if it was used on me?
17 Q. Yes.
18 A. Well, then the answer would be yes, because I
19 had always, I had always used my own needle.
20 Q. You used a needle on yourself which you
21 had used before?
22 MR. SCAROLA: How about this: Have you
23 used the same needle more than once?
24 MR. LUTTIER: Fine.
25 THE WITNESS: Yes.

0270

1 BY MR. LUTTIER:
2 Q. Okay. And when was it that you did that?
3 A. I don't know.
4 Q. When was the last time you used a needle?
5 A. Back in July when I gave myself a staph
6 infection.
7 Q. And the needle that you used in July, had
8 you used it before?
9 A. Obviously if I gave myself staph with it.
10 Q. And when had you used it before July?
11 A. In the same day or two. I don't remember.
12 Q. And for what reason had you used it in the
13 same day or two?
14 A. Because it was the last one I had.
15 Q. But what did you use it for in the same
16 day or two?
17 A. To inject my prescription Roxicodone.
18 Q. So, in July you had injected yourself at
19 least three times with Roxicodone?
20 A. I told you two.
21 Q. So, the needle that you used in July, when
22 you injected Roxicodone, you had used either same
23 time day or the day before to inject yourself with
24 Roxies?
25 A. Uh-huh.

0271

1 Q. Which would mean that would be the second
2 time you used it, right?

3 A. Yes.

4 Q. Had you used it at any time before that?

5 A. No.

6 Q. So this needle you only used twice?

7 A. Yes.

8 Q. Were there other needles that you had used
9 in the past on yourself that you had used on
10 yourself more than once?

11 A. No. It's raining.

12 MR. SCAROLA: Uh-huh.

13 BY MR. LUTTIER:

14 Q. Isn't it, is it true at that Wellington
15 Regional would not discharge you because they deemed
16 you to be an IV drug user?

17 A. That's not true.

18 Q. Did you give them a history that you were
19 an IV drug user?

20 A. I led them, I told them I was an IV drug user.

21 Q. What exactly did you tell them about your
22 IV drug usage?

23 A. That I am an IV drug user.

24 Q. And did you give them anything, any more
25 detail than that?

0272

1 A. I told them that I shot Roxies.

2 Q. Did you tell them that you, that you shot
3 Roxi pursuant to a prescription?

4 A. Pursumed (phonetic).

5 Q. Pursuant to a prescription.

6 A. What does that mean?

7 Q. That the reason that you did it was you
8 had a prescription to do it?

9 A. Yeah.

10 Q. You are sure that you told them it was
11 pursuant to a prescription?

12 A. I told them. They asked me. I told them I
13 had a prescription. I no longer have that prescription,
14 and I no longer go to that doctor.

15 Q. When did you, when did that prescription
16 expire?

17 A. Earlier this year or last year.

18 Q. Being '08?

19 A. Yeah.

20 Q. And when you say the prescription expired,
21 what do you mean?

22 A. Well, it didn't really expire. I mean, I
23 never went and got a new prescription.

24 Q. When you say the prescription expired, do
25 you mean you ran out of the pills that you had

0273

1 purchased?

2 A. Yeah.
3 Q. And that happened in '08?
4 A. Yeah.
5 Q. So, in July of '09 when you were shooting
6 up Roxicodone, where did you get those Roxicodone?
7 A. Oh, no. I still had the prescription but I
8 never went back to the doctor to get a new one. I had
9 the same prescription from '08 in '09.
10 Q. And you got it refilled?
11 A. No.
12 Q. Okay. Let's go back.
13 A. No. I saved the Roxie pills.
14 Q. I thought you told me a minute ago that
15 your prescription had expired and by definition --
16 A. I meant as --
17 Q. And by definition that you had used up all
18 of the pills that you gotten initially?
19 A. No. I misunderstood you. That's why I was
20 trying to --
21 Q. So, you still had pills left?
22 A. Yes. I never went back to the doctor to get a
23 new prescription, so I still had some in the bottle from
24 last year.
25 Q. When did you first use cocaine?

0274

1 A. During the time I met Mr. Epstein. I was
2 going Mr. Epstein's.
3 Q. And you never, prior to that had you used
4 it in any form, powder or crack?
5 A. No.
6 Q. Had you told anyone that you had used
7 cocaine prior to the time that you went to
8 Mr. Epstein's?
9 A. No.
10 Q. When did you first use marijuana?
11 A. Prior to the time I went to Mr. Epstein's.
12 That was the only drug I ever used before I met
13 Mr. Epstein.
14 Q. And you started using marijuana at age
15 what?
16 A. Thirteen.
17 Q. And you used it with what degree of
18 frequency?
19 A. I don't know, every day.
20 Q. And you were able to purchase that?
21 A. Yeah.
22 Q. At 13?
23 A. Yeah.
24 Q. Where did you get the money to buy that
25 marijuana?

0275

1 A. Allowance, about all I could --
2 Q. Did you get the allowance from your
3 mother?

4 A. Yeah, or cleaning people's houses or yard
5 work, stupid stuff kids do.
6 Q. And have you ever had a sexually
7 transmitted disease?
8 A. If you want to -- pelvic inflammatory disease,
9 but I got it from a tampon.

10 Q. Other than Roxicodone, have you ever
11 obtained -- well, strike that.
12 Have you ever obtained any type of pill
13 from any source whatsoever other than through a
14 prescription issued by a doctor?

15 A. What do you mean like have I gotten a pill --

16 Q. Yep.

17 A. -- from anywhere else?

18 Q. Yep. Somebody gave you pills. You bought
19 the pills. Anything like that?

20 A. Yeah.

21 Q. And what kind of pills had you taken that
22 you didn't have a prescription for?

23 A. Percocet.

24 Q. And with what degree of frequency?

25 A. Like I took one one time.

0276

1 Q. At what age did you start taking pills
2 that you didn't have prescriptions for?

3 A. Twenty-two.

4 Q. You said you took Ms. [REDACTED] to
5 Mr. Epstein's as well, correct?

6 A. Yes.

7 Q. What did you tell Ms. [REDACTED] before you took
8 her there the first time?

9 A. I told her what was going to happen.

10 Q. What exactly did you tell --

11 A. But she did more things willingly than I even
12 told her.

13 Q. How do you know that?

14 A. Because I was there and I left the room.

15 Q. What did you see [REDACTED] do?

16 A. She was offering information and Mr. Epstein
17 asked me to leave the room, and I was leaving the room.

18 Q. Offering information on what?

19 A. On things that her and her mother did.

20 Q. Like what?

21 A. I have no idea. I don't remember. I just
22 remember her saying things that her and her mother did
23 and I felt uncomfortable. And her and Mr. Epstein were
24 laughing and he asked me to leave the room and I left
25 the room.

0277

1 Q. Well, if you have a recollection that she
2 said something about --

3 A. I said I don't have the recollection of
4 exactly what she said. I remember --

5 Q. What's your best recollection of the

6 subject matter about which she was talking?
7 A. That her and her mom have had, her mom does
8 things and has prices for things. Something of that
9 matter. I don't --
10 Q. Sexual nature?
11 A. Yeah.
12 Q. What kinds of things?
13 A. I don't remember.
14 Q. And when you, before you took [REDACTED] to
15 Mr. Epstein the first time, what you did you tell
16 her was going to happen?
17 A. I told her that he might ask her to get nude.
18 And I told her that you were just going to massage him.
19 Q. Did you tell her anything about your
20 experience with the other woman?
21 A. I didn't tell anybody that experience about,
22 with that other woman like I told you before.
23 Q. When you took [REDACTED], the first time did you
24 go with her?
25 A. Yes.
0278
1 Q. Did you get paid?
2 A. Yes.
3 Q. How much?
4 A. \$400.
5 Q. Just for taking her.
6 A. Well, 300 that I always get and an extra 100
7 for taking her.
8 Q. On the time that you took [REDACTED], the first
9 time, did you go in with her and Mr. Epstein?
10 A. Yes.
11 Q. Did you take [REDACTED] a second time.
12 A. Yes, and that's when I was asked to leave the
13 room.
14 Q. Did you take her a third time?
15 A. No.
16 Q. After the second time did she go back
17 herself?
18 A. I don't know. Ask her.
19 Q. Did you tell her that you were getting
20 paid to take her?
21 A. No.
22 Q. Did you share that money that you got for
23 bringing her with her?
24 A. No.
25 Q. After you took her the first time, were
0279
1 you present in the room with Mr. Epstein the entire
2 time when she was there?
3 A. Other than the what --
4 Q. When you went the first time --
5 A. The first time --
6 Q. With [REDACTED], --
7 A. -- yes, I was there the whole time.

8 Q. What occurred at the first meeting of you
9 and [REDACTED] and Mr. Epstein?
10 A. We gave him a massage. She played with one
11 nipple. I played with the other, and he masturbated.
12 Q. And was the state of dress for you and
13 [REDACTED]?
14 A. We were naked.
15 Q. Totally?
16 A. Uh-huh.
17 Q. And when, and when you left did you and
18 she discuss your encounter?
19 A. No.
20 Q. Did she have any complaints about it when
21 you left?
22 A. No.
23 Q. Did she --
24 A. All she said was that was easy.
25 Q. Did she ask you if you, if you could take

0280

1 her back?
2 A. No.
3 Q. Were you present the second time she went?
4 A. Yes.
5 Q. That's the second time is when you
6 eventually walked out?
7 A. Yes. That's when I walked out.
8 Q. What occurred before you walked out?
9 A. They were joking and laughing. She was
10 telling him about some stuff that her mom and her did
11 sexually for money or some stuff like that. I don't
12 really remember the whole conversation word for word.
13 I need a drink. I have the hiccups really
14 bad. I am getting antsy.
15 MR. SCAROLA: Countdown is to about ten
16 minutes.
17 THE WITNESS: Good.
18 BY MR. LUTTIER:
19 Q. When was the first time you did acid?
20 A. When I was 19.
21 Q. And when you say acid, what specific drug
22 were you doing?
23 A. Acid.
24 Q. And in what form was it?
25 A. Paper.

0281

1 Q. And you swallowed it?
2 A. No, it dissolves on your tongue.
3 Q. And did you do it more than once?
4 A. I only did it once.
5 Q. And were you with anyone else?
6 A. Yeah, my friends.
7 Q. Who?
8 A. I'm not giving you their names. It's
9 irrelevant.

10 Q. Okay. You're refusing to answer that
11 question?
12 A. Yes, yes, I am.
13 Q. Who provided the acid?
14 A. That's irrelevant and I refuse to answer that
15 one too.
16 Q. Was this after you got back from Georgia?
17 A. Yeah.
18 Q. So, there came a point in time after you
19 had been drug free --
20 A. Yes.
21 Q. -- from Georgia that you decided to take
22 it up again, right?
23 A. Yep.
24 Q. When was the first time you started doing
25 drugs again after you had been drug free until
0282

1 January of '05?
2 A. When I was 18. When I was 18.
3 Q. Do you remember the event?
4 A. Do I remember the event that I did the drug?
5 Q. Yeah.
6 A. Yeah.
7 Q. And was it, was it on your birthday?
8 A. No.
9 Q. All right. Was it in January of '05?
10 A. No.
11 Q. When was it?
12 A. I was 18 but I don't remember the direct
13 month.
14 Q. Okay.
15 A. I know it was not by my birthday.
16 Q. Okay. And can you describe the event?
17 A. Some other people were doing it, so I did it.
18 Q. What drug?
19 A. Crack.
20 Q. And where were you?
21 A. In a house.
22 Q. First time you had done it?
23 A. Yeah.
24 Q. And who was with you?
25 A. People. Not giving you their names because
0283

1 it's irrelevant.
2 Q. And what house?
3 A. One that somebody lived in.
4 Q. And who supplied the crack?
5 A. I don't know.
6 Q. And after having been drug free from May
7 of '03 to January '05, why did you decide to do
8 crack?
9 A. I was going through a lot of things in my
10 brain. I had lost my boyfriend due to Mr. Epstein. I
11 lost my kid due to his stupid father. So, I was going

12 through a lot. Why does anybody take up using drugs
13 or --

14 Q. What boyfriend are you referring to,
15 saying you lost your boyfriend?

16 A. [REDACTED].

17 Q. Now, why do you say you lost [REDACTED] because
18 of Mr. Epstein?

19 A. Because he found out finally we got into an
20 argument and I just told him everything that had
21 happened and --

22 Q. And when did you do that?

23 A. After I had my son.

24 Q. While you were in Georgia?

25 A. No, while we were in Florida. I had my son in

0284

1 Florida.

2 Q. And that's the first time you told [REDACTED]
3 everything?

4 A. Yeah.

5 Q. And what was his reaction?

6 A. Obviously it wasn't good if I am not with him.

7 Q. Well, did he, on that particular occasion
8 leave and say he didn't want anything to do with
9 you?

10 A. No. We argued for a while. We tried to make
11 it work and it just wouldn't work.

12 Q. Okay. Other than the fact that you and
13 [REDACTED] had broken up and you had lost your kid, and
14 the kid that you're talking about there, is that
15 [REDACTED]?

16 A. [REDACTED].

17 Q. Anything else that caused you to use crack
18 in January of '05?

19 A. I was depressed about my whole life. And I
20 felt disgusted by Mr. Epstein.

21 Q. Well, actually the sexual encounters that
22 you had with others were far more extensive than
23 anything --

24 A. What are you talking about--

25 Q. -- anything you had ever done with

0285

1 Mr. Epstein, right?

2 A. -- sexual encounters?

3 Q. I mean you, you had done, you had engaged
4 in sex with others, you engaged in sex with both
5 sexes. You had done all sorts of things that
6 Mr. Epstein never did with you, hadn't you?

7 A. So, what does that have to do with
8 Mr. Epstein, my sex life.

9 Q. When you talk about being disgusted --

10 A. Why don't you get naked in front of an old man
11 and play with his nipples while he masturbates. You do
12 that and then you tell me if you feel good.

13 Q. And as you mentioned earlier, you did that

14 to get money?
15 A. So? It still doesn't make it right.
16 Q. And any other reason why you decided to go
17 back and start using crack cocaine?
18 A. What do you mean go back and start using it?
19 Q. Any other reason why you started to go
20 back to drugs and in particular crack co, start
21 using crack cocaine in January of '05?
22 A. I never heard of it and it was the first time
23 so I tried it.
24 Q. Had you ever seen your mother use crack
25 cocaine?

0286

1 A. No.
2 Q. Had you ever been present when your
3 mothers was arrested for using crack cocaine?
4 A. No.
5 Q. Did you tell anybody your mother used
6 crack cocaine ever?
7 A. My mom used to be an alcoholic, whether she
8 used --
9 Q. That's not my question. Did you ever tell
10 anybody ever --
11 A. No.
12 Q. -- that your mother used crack cocaine?
13 A. No.
14 Q. Not [REDACTED], not anybody else?
15 A. No.
16 Q. Did you ever prostitute yourself for
17 drugs?
18 A. No.
19 Q. Did you do acid on more than one occasion?
20 A. No.
21 Q. When did you first use Ecstasy?
22 A. I think when I was 14.
23 Q. Before you met Mr. Epstein?
24 A. No, during, meeting Mr. Epstein.
25 Q. What?

0287

1 A. After I had met Mr. Epstein.
2 Q. Well, you didn't meet him until you were
3 15.
4 A. I don't think that's right. I met him when I
5 was 14. I think I saw him for longer than just that
6 year.
7 Q. Well, according to your complaint the
8 first time you meet him was when you were 15?
9 A. I don't -- that, I don't know.
10 MR. SCAROLA: That may be an error.
11 THE WITNESS: Yeah, I think that's an
12 error.
13 BY MR. LUTTIER:
14 Q. When did you -- what were the
15 circumstances surrounding, surrounding you first

16 using Ecstasy.
17 A. I was at a party.
18 Q. Where?
19 A. In West Palm Beach. Who was there, I don't
20 know. A bunch of people.
21 Q. And who provided the drug?
22 A. I don't know.
23 Q. Mr. Epstein certainly wasn't there, right?
24 A. No, Mr. Epstein was not there.
25 Q. Okay. Did somebody give you the drug or

0288

1 did you purchase the drug?
2 A. Somebody gave it to me.
3 Q. Had you ever used it before?
4 A. No.
5 Q. Did you ever use it again?
6 A. No.
7 Q. Did you enjoy it?
8 A. No. It was kind of weird.
9 Q. When was the first time you used heroin?
10 A. When I was 21.
11 Q. And what were the circumstances
12 surrounding you using heroin?
13 A. I was just trying it to try to escape my
14 problems.
15 Q. And where were you?
16 A. In my house.
17 Q. Where your mother lives?
18 A. No. In mine and [REDACTED] house.
19 Q. Did [REDACTED] use it with you?
20 A. Yeah.
21 Q. Who provided the heroin?
22 A. I don't know. Some dude.
23 Q. Was there more people there than just you
24 and [REDACTED]?
25 A. Yep.

0289

1 Q. And how did you take the heroin?
2 A. I snorted it.
3 Q. And did you use it again?
4 A. No.
5 Q. No one forced you to do it?
6 A. Donny did.
7 Q. How did he force you to do it?
8 A. He told me to do it.
9 Q. So he --
10 A. And I didn't want to. And he didn't like grab
11 me and tell me to do it, but I didn't want to and he
12 argued with me about it, so I just did it to stop
13 arguing.
14 Q. When was the first time you used crystal
15 meth?
16 A. I was, I was like 18.
17 Q. And where did you use that?

18 A. In a house.
19 Q. With, who were you living with at the
20 time?
21 A. I was living with myself. Some people were
22 doing it. I snorted it.
23 Q. People you invited over?
24 A. People I invited over. People other people
25 invited over.

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1 Q. Was it given to you or did you buy it?
2 A. It was given to me.
3 Q. And why did you do it?
4 A. Something new to do.
5 Q. Have you ever gone through detox?
6 A. Yes.
7 Q. How many times?
8 A. Twice.
9 Q. When was the first time?
10 A. Earlier this year.
11 Q. That is earlier of '09?
12 A. Yes.
13 Q. Do you remember what month?
14 A. No.
15 Q. And where did you go through detox the
16 first time?
17 A. In my living room. I went --
18 Q. And you were detoxing yourself?
19 A. Yes. And also I detoxed at CARP.
20 Q. Both, is that the, this is what you have
21 indicated is the first time both in your living room
22 and at CARP?
23 A. (Witness nods head.)
24 THE COURT REPORTER: Is that a yes?
25 THE WITNESS: Yes.

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1 BY MR. LUTTIER:
2 Q. And the second time when did you detox?
3 A. At CARP.
4 Q. When?
5 A. I don't know.
6 Q. Well, you said the first was early '09.
7 Does that mean the second was sometime after that?
8 A. Yeah.
9 Q. How long --
10 A. It was all in '09.
11 Q. How long after the first time?
12 A. Like a month or two later.
13 Q. And what were you detoxing yourself from
14 the first time in '09?
15 A. Roxies.
16 Q. Well, that was the drug that you were
17 taking pursuant to your prescription?
18 A. Yes.
19 Q. When did you become addicted to it?

20 A. While I was being prescribed it.
21 Q. Did you tell the doctor you had been
22 become addicted to it?
23 A. Yes, this is why I no longer get a
24 prescription for it.
25 Q. And what were you getting detoxed from the
0292
1 second time at CARP?
2 A. Roxies.
3 Q. So you had to be detoxed twice from
4 Roxies?
5 A. Well, yes, because I detoxed the first time
6 and then I went back to using them again because of my
7 back pain.
8 Q. Did you report to the physician that was
9 giving you the prescription that you had been
10 detoxed one time before you went back to using?
11 A. No. Because if you recall in your notes, I
12 saved the prescription to the next year after I had
13 stopped going to that doctor.
14 Q. So, you continued to take the drug even
15 though you had detoxed from the drug?
16 A. Yes.
17 Q. You knew you were addicted to it in the
18 past?
19 A. Yes.
20 Q. Opted, by your own choice, to do it again?
21 A. Yes. So, if that makes me a criminal, then
22 sobeit. How much time do we have left? I want to go
23 get my son.
24 MR. SCAROLA: About two minutes.
25 THE WITNESS: Good. Yeah. I really want
0293
1 to go get my kid; the kid that I signed my
2 rights over to by the way.
3 BY MR. LUTTIER:
4 Q. What was the last grade you completed in
5 school?
6 A. Seventh.
7 Q. And what school were you attending?
8 A. Bear Lakes. Actually, yeah, actually the last
9 year I completed was seventh. I started eighth grade
10 and they kicked me out of school because I was too
11 physically developed.
12 Q. What do you mean by that?
13 A. My boobs were too big and I got sexually
14 harassed by the kids in school. So they called my mom
15 and told her she needed to sign me out. And if you
16 don't believe me, you take it up with Bear Lakes.
17 Q. So, did you enroll in another school?
18 A. No.
19 Q. Why not?
20 A. Because I didn't feel like it at the time.
21 Q. And you were, then you were what they call

22 a truant at that point?
23 A. I wasn't truant. At 16 years of age, you
24 don't have to go to school anymore. It's legal.
25 Q. So, you opted by your own free will to
0294
1 quit going to school at that time?
2 A. Yes. I got pregnant and now have a
3 six-year-old son.
4 Q. You, did you get pregnant before you had
5 dropped out of school?
6 A. No. I got pregnant after.
7 Q. What did you do during the days after you
8 dropped out of school?
9 A. Watched TV.
10 Q. Had you had run-in's with the law prior to
11 that?
12 A. When I was 18 years old, I did.
13 Q. Had you had an incident while you were a
14 juvenile where you were arrested for throwing a
15 knife at your brother or something?
16 A. Yeah, he tried to kill my cat, and then he
17 tried to kill me, so I threw a knife at him.
18 Q. Had you and your brothers been removed
19 from your mom's care on an occasion --
20 A. Never.
21 Q. -- when your mom was arrested?
22 A. Never.
23 Q. Do you remember being placed with some
24 neighbors and the neighbors calling the authorities
25 and saying they wanted someone to come pick you-all
0295
1 up?
2 A. No. We have never been removed out of my
3 mother's care or custody.
4 Q. Do you remember you and your brothers
5 being present on an occasion when your mother was
6 arrested and taken away?
7 A. No, I have never watched my mom be arrested.
8 Q. Do you remember any occasion where she was
9 arrested for possession of drug paraphernalia?
10 A. Yes. And if you look the DNA, the court did
11 DNA, and my mother's DNA was not on that paraphernalia.
12 So that charge was dropped.
13 Q. Were you present when these charges were
14 made?
15 A. I was present but I wasn't in the presence of
16 it happening.
17 Q. What do you mean by you were present but
18 you weren't?
19 A. I wasn't in the presence of it happening.
20 Q. Did you mean --
21 A. I know about it.
22 Q. Okay. Well, where were you in
23 geographical proximity to this event?

24 A. I was at my house.
25 Q. And was your mother at the house?
0296
1 A. No. I know two minutes is up.
2 MR. SCAROLA: Yeah, do you want to get to.
3 I mean, you set a 5:00 time limit.
4 MR. LUTTIER: Yeah, I do, I've got to go.
5 MR. SCAROLA: And we're there so --
6 MR. LUTTIER: All right. We'll just break
7 now.
8 THE WITNESS: Break to what? I thought
9 5:00 was at the end. I've got to go pick up my
10 kid.
11 MR. SCAROLA: Yes.
12 MR. LUTTIER: We'll reconvene you
13 deposition. I will put it on hold for right
14 now until we can get a new day.
15 THE WITNESS: Peace out.
16 THE VIDEOGRAPHER: Off the record at 5:00.
17 (A discussion was held off the record.)
18 THE COURT REPORTER: Do you want to order
19 this?
20 MR. LUTTIER: Yes.
21 THE COURT REPORTER: Do you want a copy?
22 MR. SCAROLA: Yes.
23 (Witness excused.)
24 (Deposition was adjourned.)
25

0297

1 CERTIFICATE OF OATH
2 THE STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4
5

6 I, the undersigned authority, certify that
7 [REDACTED] personally appeared before me
8 and was duly sworn on the 4th day of December, 2009.
9

10
11 Dated this 11th day of December, 2009.
12
13
14
15

16
17 [REDACTED]
18 Notary Public - State of Florida
19 My Commission Expires: February 25, 2011
20 My Commission No.: DD 643788
21
22

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24
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1 C E R T I F I C A T E
2 THE STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4

5 I, [REDACTED], Registered Professional
6 Reporter, Florida Professional Reporter and Notary
7 Public in and for the State of Florida at large, do
8 hereby certify that I was authorized to and did
9 report said deposition in stenotype; and that the
10 foregoing pages are a true and correct transcription
11 of my shorthand notes of said deposition.

12 I further certify that said deposition was
13 taken at the time and place hereinabove set forth
14 and that the taking of said deposition was commenced
15 and completed as hereinabove set out.

16 I further certify that I am not attorney or
17 counsel of any of the parties, nor am I a relative
18 or employee of any attorney or counsel of party
19 connected with the action, nor am I financially
20 interested in the action.

21 The foregoing certification of this transcript
22 does not apply to any reproduction of the same by
23 any means unless under the direct control and/or
24 direction of the certifying reporter.

25 Dated this 11th day of December, 2009.

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1 DATE: December 11th, 2009
2 TO: [REDACTED]
3 c/o Jack Scarola, Esquire
4 SEARCY, DENNEY, SCAROLA,
5 BARNHART & SHIPLEY, P.A.
6 [REDACTED]
7 [REDACTED]

8 IN RE: Jane Doe No. 2 vs. Epstein

9 CASE NO.: 08-CIV-80119-[REDACTED]

10 Please take notice that on Friday, the 4th of

8 December, 2009, you gave your deposition in the
9 above-referred matter. At that time, you did not
waive signature. It is now necessary that you sign
your deposition.

10 As previously agreed to, the transcript will be
11 furnished to you through your counsel. Please read
the following instructions carefully:

12 At the end of the transcript you will find an
errata sheet. As you read your deposition, any
13 changes or corrections that you wish to make should
be noted on the errata sheet, citing page and line
14 number of said change. DO NOT write on the
transcript itself. Once you have read the
15 transcript and noted any changes, be sure to sign
and date the errata sheet and return these pages to
me.

16 If you do not read and sign the deposition
within a reasonable time, the original, which has
17 already been forwarded to the ordering attorney, may
be filed with the Clerk of the Court. If you wish
18 to waive your signature, sign your name in the blank
at the bottom of this letter and return it to us.

19 Very truly yours,
20

21 _____
[Redacted Signature]

22 I do hereby waive my signature.
23
24 _____
25 [Redacted Signature]

0300
1 C E R T I F I C A T E

2 - - -

3 THE STATE OF FLORIDA
4 COUNTY OF PALM BEACH

5 I hereby certify that I have read the foregoing
6 deposition by me given, and that the statements
7 contained herein are true and correct to the best of
8 my knowledge and belief, with the exception of any
9 corrections or notations made on the errata sheet,
10 if one was executed.

11
12 Dated this ____ day of _____,
13 2009.

14
15
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19 _____
[Redacted Signature]

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E R R A T A S H E E T

IN RE: JANE DOE NO. 2 VS. EPSTEIN

CR: [REDACTED]

DEPOSITION OF: [REDACTED]

TAKEN: December 4th, 2009

DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE

PAGE #	LINE #	CHANGE	REASON

Please forward the original signed errata sheet to this office so that copies may be distributed to all parties.
Under penalty of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.

DATE: _____

SIGNATURE OF
DEPONENT: _____